Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Campaign for Better Transport response to the Ministry of Housing, Communities & Local Government consultation

24 September 2024

About us

Campaign for Better Transport is the leading national transport charity working across England and Wales to make transport better, greener and fairer. Our vision is for all communities to have high quality, sustainable transport that meets their needs, improves quality of life and helps protect the environment. With over 20,000 supporters, we work with politicians, civil servants, and industry to influence national and local government to maintain, expand and improve the transport offering for all.

We welcome the opportunity to respond to the consultation on the National Planning Policy Framework (NPPF) and its efforts to promote sustainable growth through the planning system. Our response focuses on the critical role of sustainable transport in ensuring the growth in development needed is compatible with social and environmental commitments.

Summary

A boost to housing and infrastructure delivery is very much needed, and there are welcome proposals in the updated NPPF to achieve this. However, we believe stronger commitments are needed to embed sustainable transport within future developments, and to move beyond the outdated 'predict and provide' model that prioritises car dependency. Our response focuses on ensuring public transport and active travel are prioritised, and creating developments that support the UK's sustainable, economic, and environmental goals.

Key recommendations:

1. Clearer vision-led development: define 'vision-led' planning more explicitly to prioritise sustainable transport
2. Minimum standards for public transport: ensure all developments, urban or rural, meet minimum access standards
3. Improved active travel infrastructure: strengthen standards for cycle lanes and pedestrian-friendly junctions in all new developments
4. Higher density around transport hubs: introduce minimum housing density levels near railway and bus stations to maximise existing infrastructure
5. Reduced car parking provision: shift to maximum parking standards, reducing car spaces in developments that promote active travel and public transport
6. Local transport operators as statutory consultees: involve bus and transport operators in the planning process to ensure developments are served by sustainable transport from the outset
7. Safeguard sites for transport growth: identify land for the expansion of bus, rail, and freight transport to support long-term economic development

8. Economic growth through sustainable transport: making public transport provision a requirement for a presumption in favour of sustainable development
9. Climate change action through planning: prioritise planning reforms that directly address climate impacts, with a presumption against carbon-intensive projects.

Below we expand on each of these recommendation areas.

1. A clearer definition of 'vision-led' development

At present, the NPPF and accompanying guidance and practice in planning for transport provision in new developments do not encourage sustainable transport provision. Instead, planning tools project for peak travel demand to 'predict and provide' for travel by car, thus locking in car reliance in new developments for the long term. The revised NPPF should require all future development to be based around existing and planned public transport provision, in order to prevent car-based development.

In relation to Question 69, we welcome the commitment in the consultation to replace the outdated 'predict and provide' principle with a new 'vision-led approach' to transport planning focusing on achieving the desired outcomes. However, the amendments proposed to paragraphs 114 and 115 is not clear enough. We call for a much clearer definition of what 'vision-led' development means in practice, particularly in relation to sustainable transport. Vision-led development should not simply aspire to delivering sustainable transport in the future but embed them at the core of planning. The NPPF should specify that developments should provide public transport services and walking, wheeling and cycling infrastructure from the outset. This would ensure that developments avoid locking in car dependency, and are instead shaped by a forward-thinking, sustainable, and resilient framework.

2. Minimum standards for sustainable transport access

We are concerned by the phrasing of Paragraph 116a of the existing NPPF, which states that access to high-quality public transport should be facilitated "so far as possible". This weakens the framework's commitment to a 'vision-led approach' explained in the preceding paragraph 114, and the embedding of sustainable transport. All developments, regardless of whether they are in urban or rural areas, should meet minimum standards of access to public transport. A tool similar to London's Public Transport Access Level (PTAL) ratings could be adopted to measure this access, ensuring that new developments are connected to transport networks that promote sustainable travel choices. Question 69 highlights the importance of setting stronger planning conditions to ensure public transport is available from the outset, avoiding the assumption that residents will need cars for day-to-day travel.

3. Prioritising active travel and cycle infrastructure

Paragraph 116a of the existing NPPF currently states development applications should "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas", which is welcome to making active travel a key component of transport infrastructure. Yet stronger design standards for pavements, cycle lanes and junctions are needed to ensure that active travel is a safe and attractive option. In response to Question 70, the NPPF should explicitly set out these requirements, ensuring that walking, wheeling and cycle networks are integrated into all new developments and existing transport corridors. This would go a long way towards promoting healthy communities, encouraging active travel, and thereby tackling childhood obesity.

4. Minimum density levels around existing transport infrastructure

Relating to Questions 4 and 5, we agree with deletion of paragraph 130 in order to promote greater densification around urban areas, particularly around existing transport hubs. However, we believe a stronger link needs to be made between spatial visions in local plans and promoting higher-density developments around public transport networks, ensuring that the focus remains on

creating sustainable, integrated communities.

To maximise the potential of existing transport infrastructure, particularly railway stations, minimum density standards must be introduced. Studies, such as Russell Curtis' mapping of railway stations, show that with appropriate planning, significant housing can be developed within walking distance of public transport hubs, even in rural areas. A minimum density of 50 houses per hectare around transport hubs should be a requirement for significant developments. Building in an 800-metre radius of each station (a maximum 10-minute walk to that station) would mean potentially 1.2 million houses could be built around existing railway stations.[1] This approach would promote sustainable transport modes while also addressing housing shortages in a way that does not exacerbate car dependency. Further in relation to Question 28, 'land in the right places' should include a definition of land in the immediate vicinity of existing public transport infrastructure.

5. Reducing car parking provision in new developments

We are concerned by the references in Paragraph 111 of the existing NPPF to setting car parking standards based on existing public transport provision and local car ownership levels. This model is counterproductive to a vision-led approach. Instead, planning authorities should require developer contributions towards improved public transport connectivity, and new developments should be designed with reduced parking provision to make active travel and public transport options are viable. Reducing parking spaces encourages alternative travel modes, frees up space for additional housing, and helps align developments with the UK's Net Zero goals.

Paragraph 112 of the existing NPPF specifies that "maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport". We suggest that this section should be deleted, and maximum parking standards encouraged. A shift towards maximum rather than minimum parking standards is crucial in reducing car dependency and encouraging the uptake of shared transport options, such as car clubs. We urge a similar approach be adopted in response to Question 69.

6. Making local transport operators statutory consultees

We welcomed the inclusion of Active Travel England as a statutory consultee for developments exceeding certain thresholds. While Paragraph 16c of the existing NPPF says that planning authorities should consult infrastructure providers and operators, we suggest that bus companies and other local transport operators should also be made statutory consultees. Many housing developments have been designed in ways that make them inaccessible to buses, restricting future service provision. There are also many instances where extensions of existing bus routes would enable new developments to be served efficiently and cost-effectively. Ensuring that bus operators are involved in the planning process will help plan for provision early on to ensure that new developments are served by public transport from the outset, further reducing car dependency.

7. Identifying sites for bus and rail growth, including freight transport

The NPPF must place a stronger emphasis on identifying and safeguarding land for the expansion of bus and rail services, including sites for freight transport by rail. The economic and environmental benefits of increasing public transport and reducing road freight are significant. Recent research by CPT highlights the vital role that bus services play in local economies, with bus passengers contributing £40 billion every year to local economies.[2]

In relation to Questions 62 and 63, we welcome the inclusion of freight as a sector for specific

[1] https://ruralstations.russellcurtis.co.uk/

[2] https://www.cpt-uk.org/media/couiyy5y/240902-economic-impact-of-bus-final.pdf

support, given that it is essential for decarbonisation and adapting to new logistics patterns. However, we suggest adding the need to identify land for the needs of the bus and rail sectors. With fast electrification of both bus and rail depots, timely upgrades of energy infrastructure and grid connectivity will be required. Designating transport hubs and freight facilities as critical economic infrastructure in local plans would further support sustainable growth.

8. Building a strong, competitive economy through sustainable transport

The revised NPPF should recognise the crucial role of sustainable transport in supporting a strong, competitive economy. Public transport not only reduces congestion but also provides significant economic benefits. Both buses and rail directly support local economies and help to drive employment. Encouraging local authorities to prioritise investment in transport infrastructure will help ensure that town centres remain vibrant, accessible, and sustainable. We suggest that the Paragraphs 7 and 8 of the NPPF should make a specific reference to having public transport provision as part of the requirements for a presumption in favour of sustainable development.

9. Addressing climate change through planning

In response to Question 81, sustainable transport provision must be at the centre of using planning to tackle climate change. Transport is currently the UK's largest emitting sector of greenhouse gases, producing 26% of the UK's total emissions. We support the Government's view that the planning system has a vital role in addressing climate change, and that action is needed to mitigate and adapt to its effects. However, the NPPF does not currently go far enough. There should be a presumption against any development that increases carbon emissions. The NPPF should also include stronger guidance on the carbon impact of planning decisions, ensuring that climate change is at the forefront of all planning considerations.

Conclusion

The NPPF must take bold steps to ensure that all new developments are centred around sustainable transport options. By doing so, the framework can help create communities that are not only environmentally sustainable but also economically and socially vibrant. Ensuring access to sustainable transport, reducing car dependency, and involving transport operators in the planning process will be key to delivering this vision.

We look forward to seeing these crucial changes reflected in the final NPPF to ensure a more sustainable future for all.