

Transport for New Homes response to Planning for the Future consultation

About Transport for New Homes

Transport for New Homes believes that everyone should have access to attractive housing, located and designed to ensure that people do not need to use or own cars to live a full life.

Transport for New Homes is a project funded by the Foundation for Integrated Transport, a registered charity (115 63 63).

Summary

We are writing to object to the planning reforms proposed in the White Paper. We believe they conflict with government policies to reduce carbon emissions, promote more active travel and less isolated life styles, and regenerate town centres.

The planning reforms as they stand are likely to push more traffic onto our roads, adding to congestion on key inter-urban routes and on roads into our cities. They will mean country roads with ever- increasing traffic queues at junctions.

These problems arise because of the undue emphasis in the White Paper on speeding up the construction of homes in the countryside away from major urban areas. By pushing new homes so far away from jobs and services, in places where public transport is very limited and walking and cycling hard as destinations are too far, the reforms are likely to encourage more car-based sprawl.

We are sure that government does not want more ugly 'tarmac estates' of the sort that are being built now, but that is exactly what we think will result unless the reforms in the White Paper are changed.

We therefore strongly recommend that planning reform takes a much greater interest in transport and where best to build. Transport cannot be left out of the picture. The National Policy Planning Framework and any new Sustainability Test should have this notion of accessibility by sustainable transport modes as a fundamental requirement during the preparation of a Local Plan, particularly at the site selection stage.

We also recommend that there are new arrangements for local authorities to coordinate substantial new-build along existing or new rail/light rail/tram/bus corridors, working cross-boundary to make this happen. This would be a move away from coupling new homes with large-scale new road capacity which is increasingly an outdated model, and would re-direct funds accordingly to more sustainable transport modes.

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We attach our 2018 and 2020 reports. Please read these reports for the evidence base of our response.

Consultation questions

1. What three words do you associate most with the planning system in England?

No response.

2. Do you get involved with planning decisions in your local area?

No response.

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

No response.

4. What are your top three priorities for planning in your local area?

No response.

5. Do you agree that Local Plans should be simplified in line with our proposals?

We do not agree with the proposals as outlined.

Planning and transport fail to come together in the white paper, with transport hardly mentioned. It is fundamental that you need to consider development and transport together. It's common sense.

Location, location, location. Building in the wrong location will lead to more traffic, car-based living, more isolation and less walking or cycling. We shouldn't be forcing people to live car-based lifestyles in the future.

The white paper needs to address how we will provide and fund public transport to the new places we plan, and to build where people can walk and cycle in and out of new housing areas.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

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We do not agree with the proposals as outlined.

Local policies on housing, employment, biodiversity, landscape, flooding, transport etc. are proposed to be much reduced in local plans. The National Planning Policy Framework (NPPF) then becomes the primary source of policies for your area.

Although local plans are often too verbose and complicated, and take a long time to agree, planning reform should not mean less local input and local data shaping an area. The white paper hinges on a new centrally produced planning policy in the form of the NPPF. But we do not know what the new policy will be.

It is hard to judge what is really on the table and whether sustainable transport will really feature with firm language to make its importance plain. Consulting on a white paper with an important component in the form of the NPPF missing, makes it hard to make an informed response.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

We do not agree with the proposals as outlined.

The sustainability appraisal currently used in local plan development looks at housing, transport, biodiversity, carbon, flooding, water and much more. This is proposed to go, replaced again by a single ‘sustainability test’ devised by central government.

The risk is that many local aspects of planning will receive less thought, and that the definition of what is ‘sustainable’ will be centrally specified in ways that might pick up sustainability issues in a local area. It is unclear at this stage what would be deemed as ‘unsustainable development’ yet this is key to responding to the white paper.

The white paper without detail on the sustainability test is not a coherent document. We need to see what this sustainability test will contain because it’s absolutely critical and will be used to judge local plans.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The Duty to Cooperate should not be removed.

Less coordination in planning across a wide area is a mistake. The duty to cooperate with adjacent authorities on planning is removed and it remains unclear how adjacent local

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authorities should plan together to build targets for new homes and plan a wider area intelligently.

The white paper concentrates on local authority areas and misses out the benefits of wider 'strategic' planning, which is essential. Only with a wider view can developments be coordinated along public transport routes.

Planning across a wide area can test out different scenarios to see where best to build, considering transport, job density, service provision, ecology, favourite countryside etc. It can't be left out – that's bad geography and will result in uncoordinated sprawl.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

We do not agree with the proposals as outlined.

High housing targets are proposed for rural and semi-rural areas which are already being covered with car-based sprawl will lead to the wrong pattern of development. Targets neglect to take into account the locations of jobs, services and amenities, or the right places to build for sustainable transport. We need to build close to major areas to enable people to travel where they want to without long journeys by car.

As further high housing targets are given to rural and semi-rural areas it looks like a recipe for even more car-based sprawl. We need a more measured consideration of how much to build where, putting proximity to jobs, increasingly centralised services and community provision rather than building 'out in the sticks'.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

We do not agree with the proposals as outlined.

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

We do not agree with the proposals as outlined.

The 'zoning' idea in the white paper, whereby England is divided into just three categories fails to capture the physical, social and environmental aspects of the country and is wrong.

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The white paper is clear: 'All areas of land would be put into one of these three categories'. Much countryside without a national designation will likely be in the 'growth area' even if valuable in other ways.

The white paper indicates that development in a 'growth area' will be fast-tracked and that developments will get automatic outline planning permission. At an outline planning everything from transport and access, to community provision, ecology, flooding and supply of utilities are considered.

Missing this stage out will result in mistakes being made and will fail to locate the transport and other needs of a large site. Especially if the local plan was produced some while ago, the development needs review closer to its actual build date.

The division of England into just three categories for the purpose of planning is not useful to planning properly.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

We do not agree with the proposals as outlined.

The division of England into just three categories for the purpose of planning is not useful to planning properly.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No response.

11. Do you agree with our proposals for accessible, web-based Local Plans?

We do not agree with the proposals as outlined.

Use of maps and data should reflect a proper evidence base for more intelligent planning, with land uses and transport detailed so that people can see where best to develop.

The white paper talks about the use of digital mapping to show people what is planned for their area. This is an exciting idea, but it depends how and for whom the system is set up.

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Digital mapping as a planning tool for everyone's use is a great idea but what will the maps show and how will they be used? Will they work cross-boundary, enabling zooming in and out to see both development and transport infrastructure and services in the next local authority area?

How will maps be used to decide where best to build? What data sets will be shown in the different layers and will all be available to the public to look at? It is important to think now about the role of digital maps much more clearly.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

No response.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

No response.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

No response.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

No response.

15. What do you think about the design of new development that has happened recently in your area?

No response.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

No response.

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17. Do you agree with our proposals for improving the production and use of design guides and codes?

No response.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

No response.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

No response.

20. Do you agree with our proposals for implementing a fast-track for beauty?

No response.

21. When new development happens in your area, what is your priority for what comes with it?

No response.

22(a). Should the government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

The new infrastructure levy to replace developer contributions risks being split too many ways. It is needed for affordable housing but then there will be less in those places for community provision and other infrastructure.

It is unclear how we can build pleasant places to live which are also affordable without adequate funds. There is a risk that pavements, urban trees, cycleways, gardens and community provision will not materialise for many new areas. The funding and provision of public transport remains unknown. The idea of 'beauty' of place as described many times in the white paper comes with a price tag – will it be for the few or the many?

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How will beautiful places be made if each home has parking for two or three cars with the usual roundabouts, access onto a bypass and so on? What is to say that we will not just build more ugly tarmac estates as opposed to mixed walkable neighbourhoods that form a real community?

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

No response.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

No response.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

No response.

24. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

We agree with the proposal as outlined.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

No response.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

No response.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

No response.

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24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

No response.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

No response.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

No response.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

No response.

Attachments

Transport for New Homes Report (2018)

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf>

Garden Villages and Garden Towns: Visions and Reality (2020)

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>