

Transport for New Homes' response to the Government's consultation on the National Planning Policy Framework and National Model Design Code

March 2021

Do you agree with the changes proposed in Chapter 2 (Achieving sustainable development)?

We support the changes to paragraph 7.

We agree with the inclusion of the 17 Global Goals for Sustainable Development. We note Goal 11: Sustainable Cities and Communities:

“By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons”

We believe planning outcomes currently fall far short of these goals. In particular we have found that new housing developments are predominately car dependent and lacking in sustainable transport systems, such as good walk and cycle provision as well as public transport. The NPPF should give stronger weight to the necessity of these features to ensure that only development that is compliant with these goals receives consent.

In paragraph 11a the phrases "sustainable pattern of development", and "mitigating climate change" by "making effective use of urban areas" need to be explained. In particular, reference is needed to locating development in locations with good public transport services. Also, it should be made explicit that "making effective use of land in urban areas" includes public transport assets as well as existing community and commercial facilities.

Paragraph 11a should also be strengthened by referring to "sustainable pattern and form of development", given that sustainable transport provision is influenced by the type and layout of development as well as its location.

Do you agree with the changes proposed in Chapter 3 (Plan-making)?

We support the changes to paragraphs 20 and 22.

Paragraph 20b refers to "infrastructure for transport". Sustainable transport services (bus/rail) are not infrastructure but are equally important. Reference should also be made here to the newly required Bus Service Improvement Plans ("Bus Back Better: National Bus Strategy for England" page 11).

Do you agree with the changes proposed in Chapter 4 (Decision making)

We oppose changes to paragraph 53.

Do you agree with the changes proposed in Chapter 5 (Delivering a wide choice of high quality homes)?

We support the changes to paragraph 73.

Do you agree with the changes proposed in Chapter 8 (Promoting healthy and safe communities)?

We support the changes to paragraph 92 and the addition of paragraph 97.

Do you agree with the changes proposed in Chapter 9 (Promoting sustainable transport)?

We support the addition of paragraphs 105 and 109.

In paragraph 105 walking and cycling routes are mentioned, but quality routes for bus services should also specifically be mentioned.

In paragraph 107 we strongly object to the statement 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..." This policy inevitably leads to the creation of car-based development, reduces the chances of achieving a reasonable proportion of travel by the sustainable modes, and lets local authorities off the hook in terms of ensuring the provision of sustainable transport facilities and services as a precursor to development. It expresses a pessimistic standpoint that development cannot in itself lead to better accessibility by public transport. Instead, maximum parking standards should be required as part of strategies to increase public transport accessibility, and to achieve the sustainable development that would be so enabled.

Do you agree with the changes proposed in Chapter 11? Making effective use of land

We support new paragraph 124.

Do you agree with the changes proposed in Chapter 12? Achieving well-designed places

We support new paragraphs 125, 127, 128 and 133.

In **paragraph 132 we strongly object** to the deletion of Manual for Streets in footnote 51. The guidance in Manual for Streets is crucial for the creation of better places.

Do you agree with the changes proposed in Chapter 13? Protecting the Green Belt

No response.

Do you agree with the changes proposed in Chapter 14? Meeting the challenge of climate change, flooding and coastal change

No response.

Do you agree with the changes proposed in Chapter 15? Conserving and enhancing the natural environment

No response.

Do you agree with the changes proposed in Chapter 16? Conserving and enhancing the historic environment

No response.

Do you agree with the changes proposed in Chapter 17? Facilitating the sustainable use of minerals

No response.

Do you have any comments on the changes to the glossary?

No response.

We would be grateful for your views on the National Model Design Code, in terms of:

a) the content of the guidance

We were interested to read the proposed National Design Code and associated Guidance and can see much good material with respect to the design and layout of new development. However, we believe that unless the National Design Code goes further and addresses the wider issues of location of development and its orientation

around sustainable transport modes, the intentions regarding good design in the National Design Code will often fail 'in real life'.

The problem is the excessive influence of the car on new developments, a problem which deeply affects many of the elements of the Design Code being discussed. Transport for New Homes is a project which involves visiting new large-scale housing developments and seeing what has been actually delivered. We have seen how the sheer amount of space devoted to roads, parking and driveways puts many of the good ideas in the Design Code out of reach. This very high proportion of land devoted to tarmac, means less greenery, often tiny gardens and little space for urban trees. It sometimes means no pavements. This kind of development also anticipates a whole lifestyle of driving for nearly every journey and of not living locally. Local shops and local community provision end up unviable with this kind of arrangement.

Even where masterplans showed good visions of places that are potentially much better designed, urban extensions and garden villages lost many of their good features as the reality of catering for a car-based lifestyle took centre-stage. The only urban extension that we visited that went squarely against the grain and delivered a mixed use walkable place around an interesting street layout properly connected by streets to its parent town, was Poundbury in Dorset. This also only had one parking space per house (with some visitor parking in addition). Many developments insist on 2-3 spaces per home. Such developments often also fund major roads to accommodate predicted traffic and large distributor roads for access. This problem of orientation around the car and its deleterious effect on design and layout needs urgent discussion and cannot be ignored.

TWO NEW CONTEXTS NEEDED: URBAN EXTENSION AND GARDEN VILLAGE

The draft National Design Code speaks of different 'contexts' of development: 'town/city centre', 'urban neighbourhood', 'suburbs', 'outer suburbs', 'local centres', 'villages rural settlements' and 'industrial areas, business, science or retail parks'.

Once the context has been established, there follows a discussion for each regarding movement, nature, built form, identity, public space and so on as applied to that context. In terms of 'movement' the guidance has sections on subjects such as connected streets, junctions and crossings, car parking, cycle parking, density, gardens and balconies, meeting places, local services and so on. For Transport for New Homes, we see an important omission. The 'contexts' that are most commonly chosen now in many Local Plans in real life, is the greenfield urban extension to market towns, and the garden village. Yet these have been left out of the National Design Code. It does not have urban extension or the garden village as a 'context'.

Perhaps urban extensions and garden villages fall into the context called 'outer suburbs'? However, this is not the case as the graphics presented shows 'outer

suburbs' are quite different smaller sites within the outer area of a town – they are not the urban extensions and garden villages planned today. A 'context' and associated design codes for a large bubble of perhaps thousands of homes on fields at the edge of the built-up area and cut off by major roads, or a big development entirely separate somewhere in the countryside, is left out.

Does this omission matter? We think it does because it will mean that many developments are likely to fail most of the guidance straight away because of their location and their car dependency - this has many deleterious knock-on effects on the built environment and how people live. The fine words describing green and well-designed places with pleasant local centres, meeting places, gardens and so on, and even good public transport links, are great. But if you are building (a) in a place that cannot be connected to existing streets to an existing town (b) around a new road system because you travel nearly everywhere by car, then the rest of the Guidance is hardly likely to be implemented.

NEW SECTION ON SUSTAINABLE TRANSPORT NEEDED WITH EXAMPLES

Although the draft text and guidance mentions public transport and cycling, the way that these should be incorporated into the fabric of a development is not made clear. In the Netherlands we met planners who showed how routes of cycleways, bus-ways, trams, and the location of new stations and transport hubs, were designed into the plan at the earliest stages. This meant that the overall function of the place as a whole was part and parcel of its design and layout. We would like to see a section in the National Design Code which looked at this aspect of things. We can supply more detail on this if useful.

b) the application and use of the guidance

It is one thing to provide check-lists for positive features but it can be equally helpful to indicate where a development risks planning in the wrong way. It is important we think, for the National Design Code to make it clear that a different model of development is now required, and that there is to be a real departure away from the mistakes of the past. These mistakes need explanation. The Design Code and the NPPF need to lead local authorities (both officers and councillors) and developers in a new direction, and this involves explaining at the same time why things have to change and how it can be done.

A proper understanding on the part of local officers and decision-makers would deliver the results required, rather than a long and complex challenges later about what the Design Code meant, might mean, could mean or may mean when applied.

Local Authority Highway Officers, Spatial Planning Committees, landowners and their promoters, and the Planning Inspectorate need to be behind the new way of doing things and how and why the National Design Code will deliver something better. Will the application of the Design Code be examined by the Planning Inspectorate? If not, how will it be definitely put into practice? Where will be the scrutiny?

THE RIGHT LOCATION AND EARLY SIFTING OF SITES AT SHLAA STAGE

It is important to select the right location for a large area of new homes and the Design Code needs to be used during the sifting process at the SHLAA stage of the Local Plan when Local Authority planners choose the best sites offered by land-owners to go forward. The ability for the development to be properly connected in more than one place to existing streets to provide continuous overlooked pavements, is important, as is to whether the place is right for frequent modern public transport. Sites failing in these respects can be discarded.

c) the approach to community engagement

See answers to the section above on the application and use.

We would be grateful for your comments on any potential impacts under the Public Sector Equality Duty.

No response.