

Upside-down geography in national planning policy

*and how putting it right would help **public transport, active travel and create better places to live***



Transport for New Homes

BRINGING TRANSPORT AND PLANNING TOGETHER

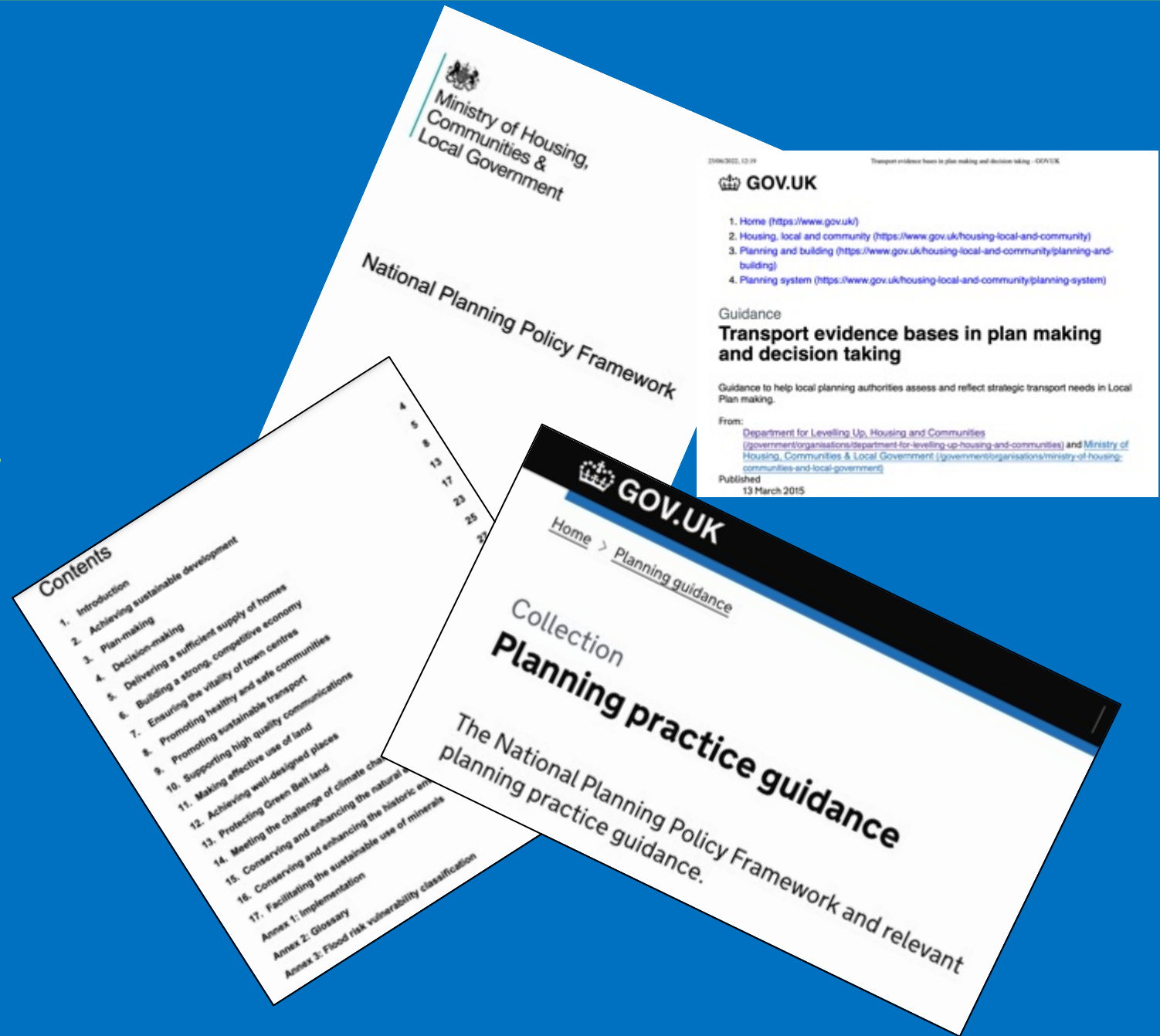


Transport is a relatively minor consideration.

As a top level objective the NPPF explains that local authorities should:

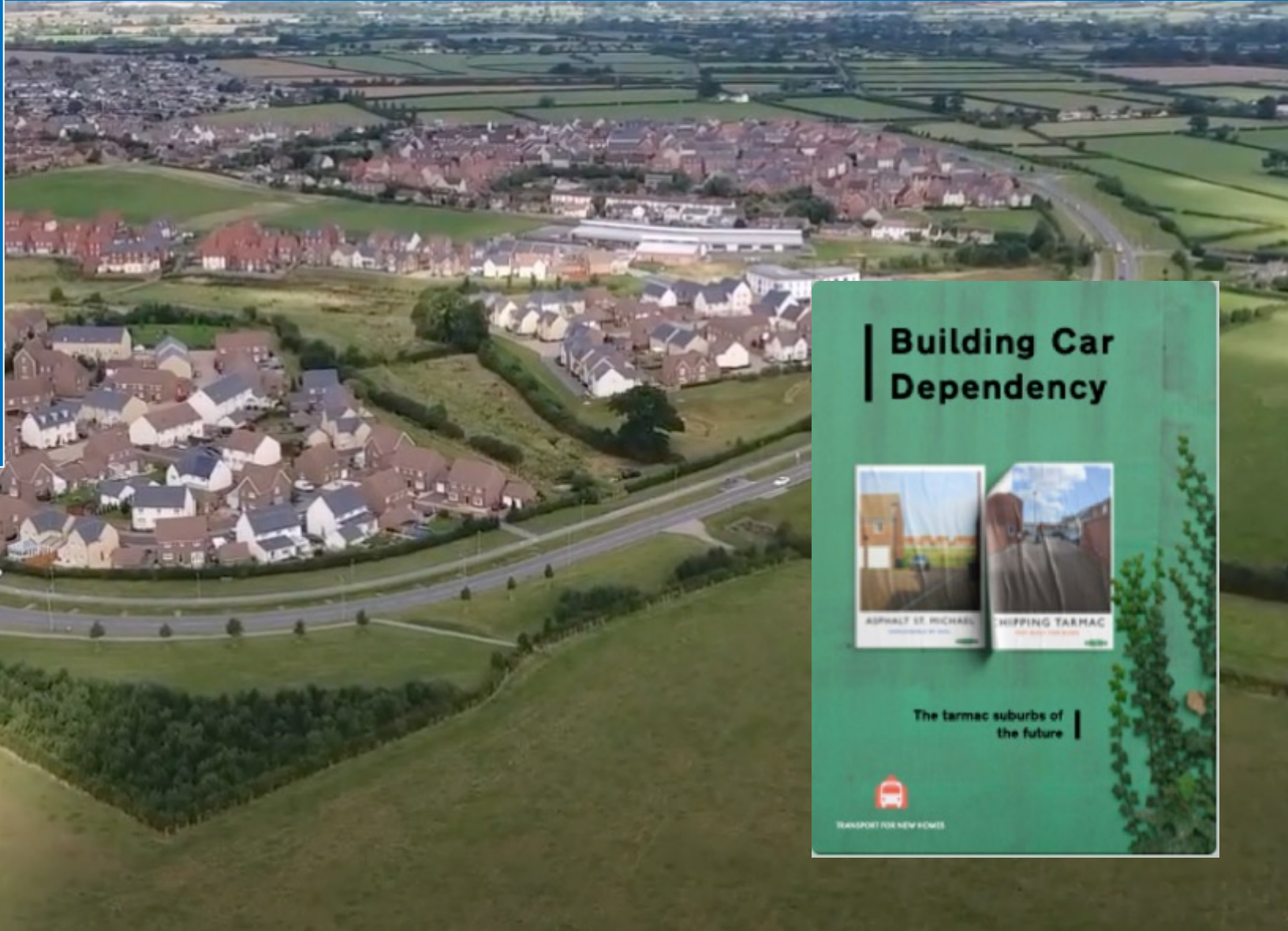
‘ promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change ...’

This sounds promising. But is it working on transport? We think not.



Transport is very much part of geography, but somehow the NPPF fails to address the subject properly.

The development model that results from this omission can be seen in many parts of the country, as explained in the Transport for New Homes 2022 report Building Car Dependency.



Location, location, location

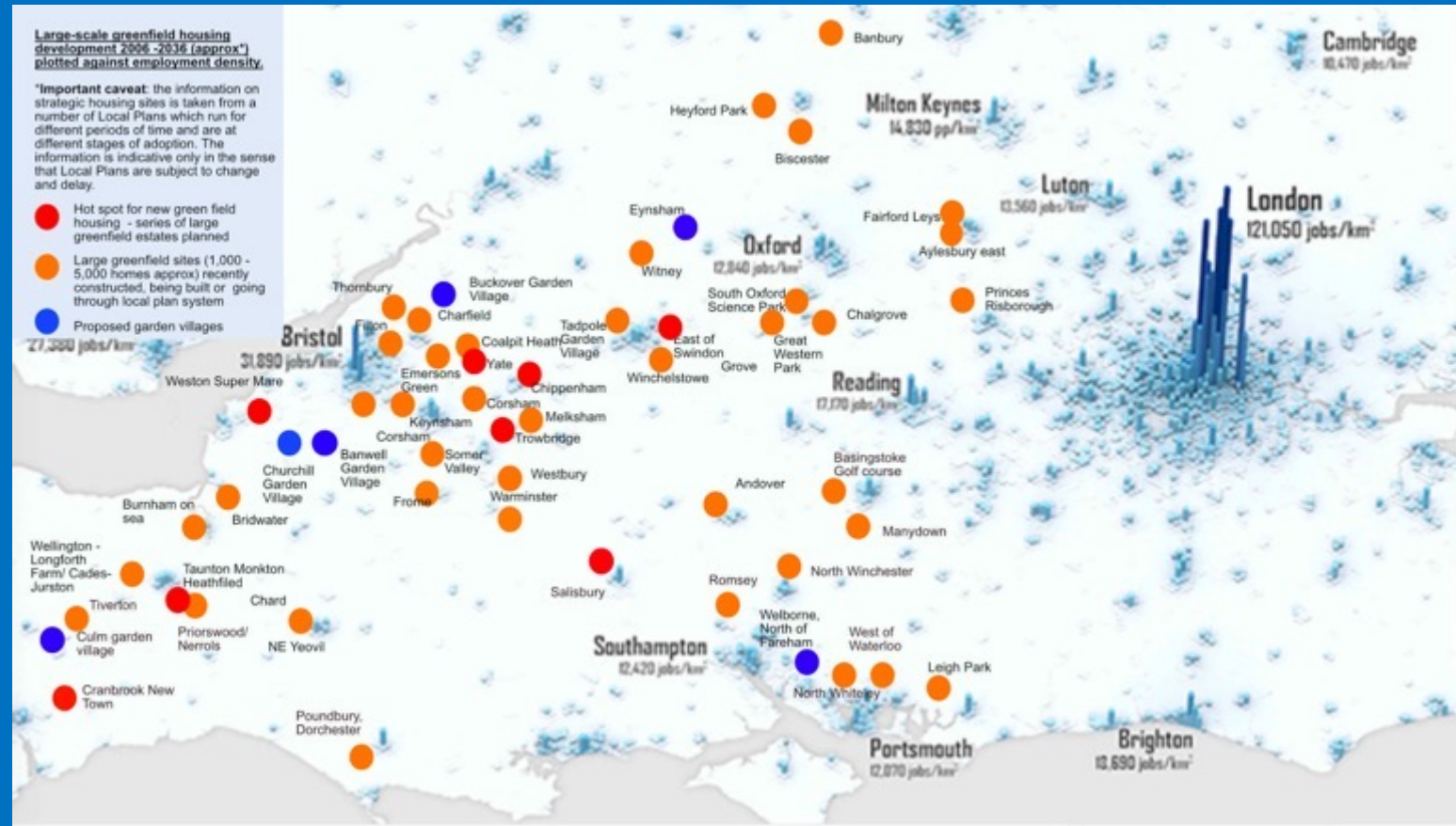
An aerial photograph of a suburban residential area. The image shows a dense cluster of houses with red and grey roofs, interspersed with green lawns and trees. A network of roads, including a prominent roundabout in the lower-left, weaves through the neighborhood. The overall scene depicts a typical suburban housing development.

An important shortcoming of the NPPF is to underestimate the importance of location in placing large-scale new housing.

Despite jobs, services and also public transport being concentrated in our cities and not in the countryside or our market towns, and despite the limited reach of urban and suburban public transport networks, the NPPF puts forward that:

‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns....’

When we overlayed major new greenfield housing on a job density map plotted by Centre for Cities, this dispersed pattern of development was very much evident.

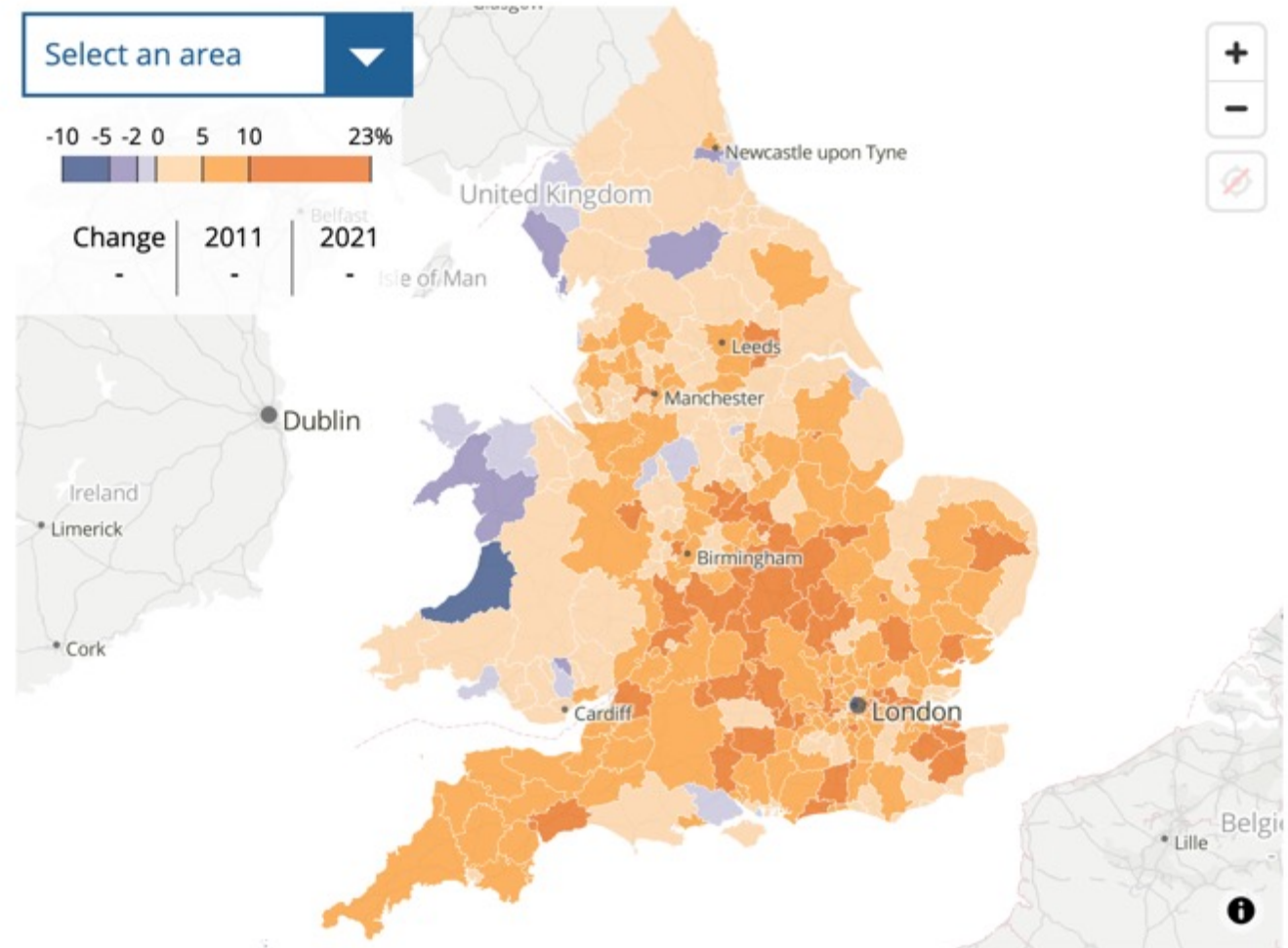


‘Counter-urbanization’

This trend to build away from urban centres can also be seen from the 2021 census report on Population and household estimates, England and Wales: Census 2022.

Figure 3 from the report shows population change 2011-2021. This is an interactive map and allows you to see just how quickly a number of rural areas are growing and a number of urban areas are not.

Figure 3: Population change between 2011 and 2021, local authorities in England and Wales





Traffic and out-of-town living

So although the NPPF asks that ...

‘opportunities to promote walking, cycling and public transport use are identified and pursued’

...if the very locations for large scale development are only easily accessed by car, the opportunities for other modes are lost.

Almost in recognition that traffic creation is inevitable and a nuisance, the NPPF asks for it to be quantified, but not actually avoided:

‘the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects...

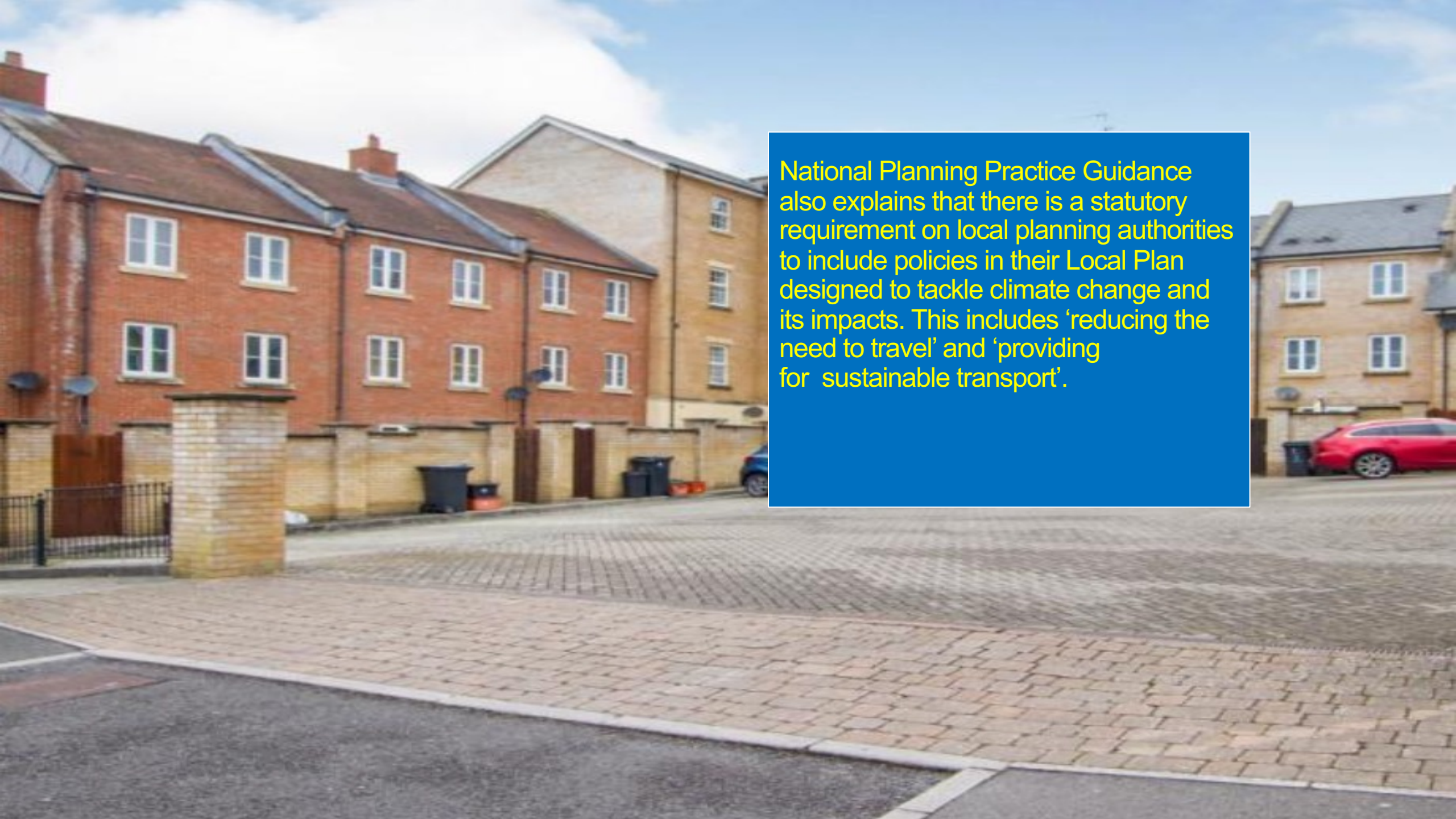
We can imagine what the ‘appropriate opportunities’ might be!

An aerial photograph showing a suburban housing development on the left, characterized by rows of houses with red-tiled roofs. A road runs diagonally from the bottom left towards the top right, separating the built-up area from a vast expanse of green agricultural fields. The fields are divided into various sized plots, some with visible crop patterns. In the far distance, more fields and some scattered trees are visible under a clear sky.

Mitigation, mitigation, mitigation

This car-based model of development is unpopular with people who already live in the area because of the traffic created, with local campaigns trying to stop the destruction of the countryside.

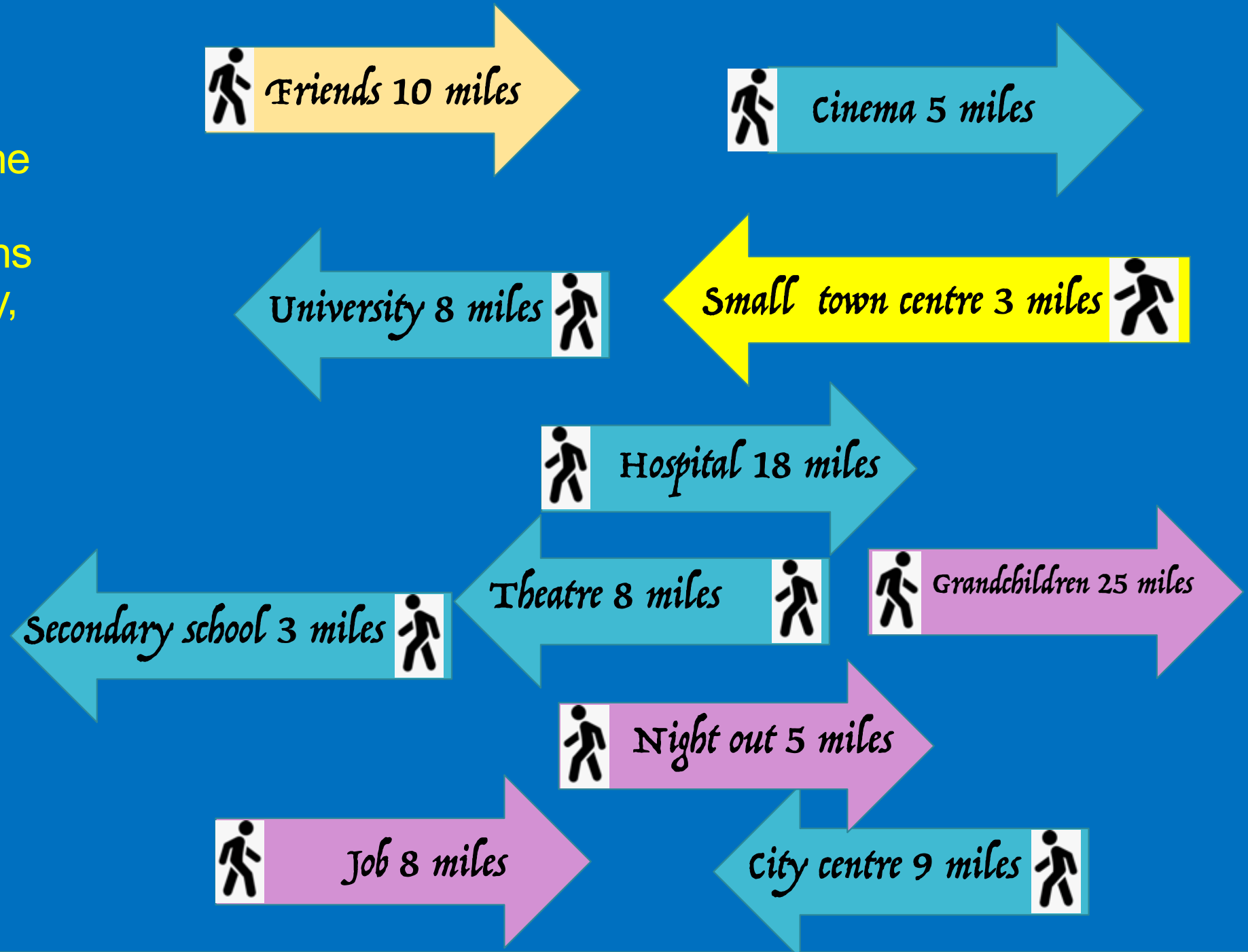
Road building is expensive. But recent reports in the planning press have highlighted other problems. These relate to the cost of mitigation for environmental impacts, for example water pollution and biodiversity impacts of large-scale housing development in the countryside.



National Planning Practice Guidance also explains that there is a statutory requirement on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. This includes 'reducing the need to travel' and 'providing for sustainable transport'.

From our own work, although 'reducing the need to travel' and 'active travel' solutions sound good in theory, in real life people do need and want to travel medium and longer distances.

So it's not so simple.



Without a frequent and modern public transport network serving new homes...

and without truly mixed use development and a location directly connected to an existing urban area...

new residents are stuck without a car for many journeys they want to make.

Take a taxi instead?
But these are expensive in more rural areas and often in short supply.



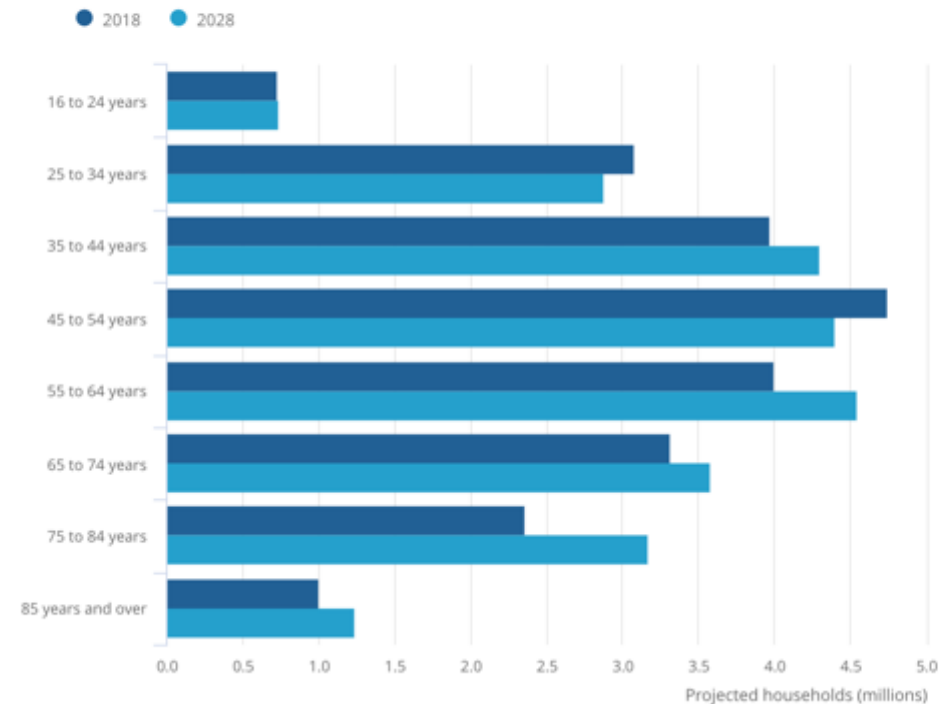
From the office of national statistics:

'the majority of household growth over the next 10 years will be because of an increase in older households without dependent children, particularly those where the household reference person is aged 75 years and over'.

Older people looking for a place to live may not want to be 'stranded'. And those that do drive, the increased cost of living and cost of fuel, may soon mean people don't want to drive everywhere. Older people may not be able to drive.

Figure 2: The largest projected growth in the number of households occurs at older ages

Projected households by age of household reference person (HRP),
England, 2018 and 2028



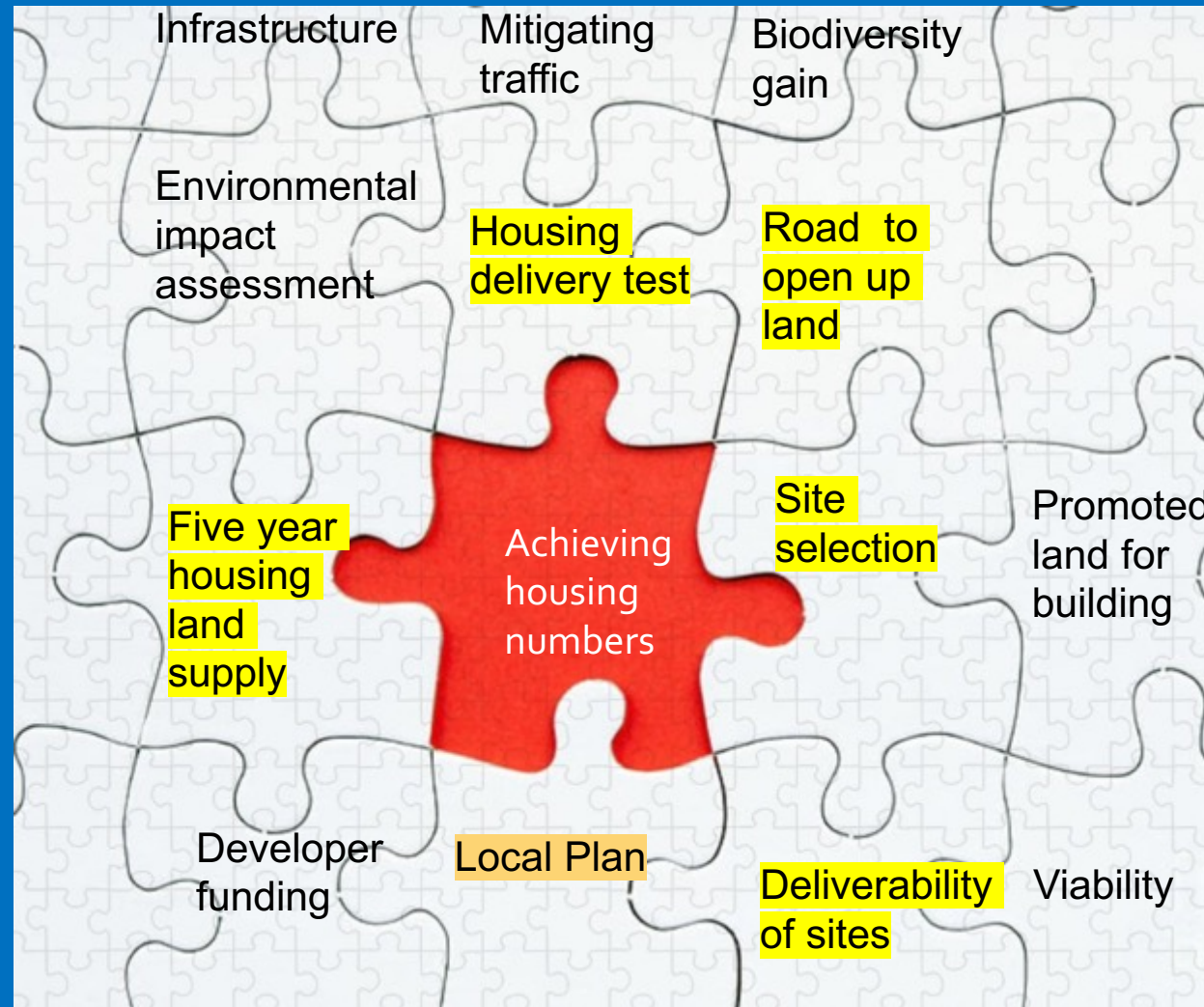
The contradiction

So far we have shown how the NPPF appears to 'want' sustainable transport and high quality walkable places. But it supports a land-use model where this cannot be achieved. It continues to promote building around the car. **Why is this happening?**



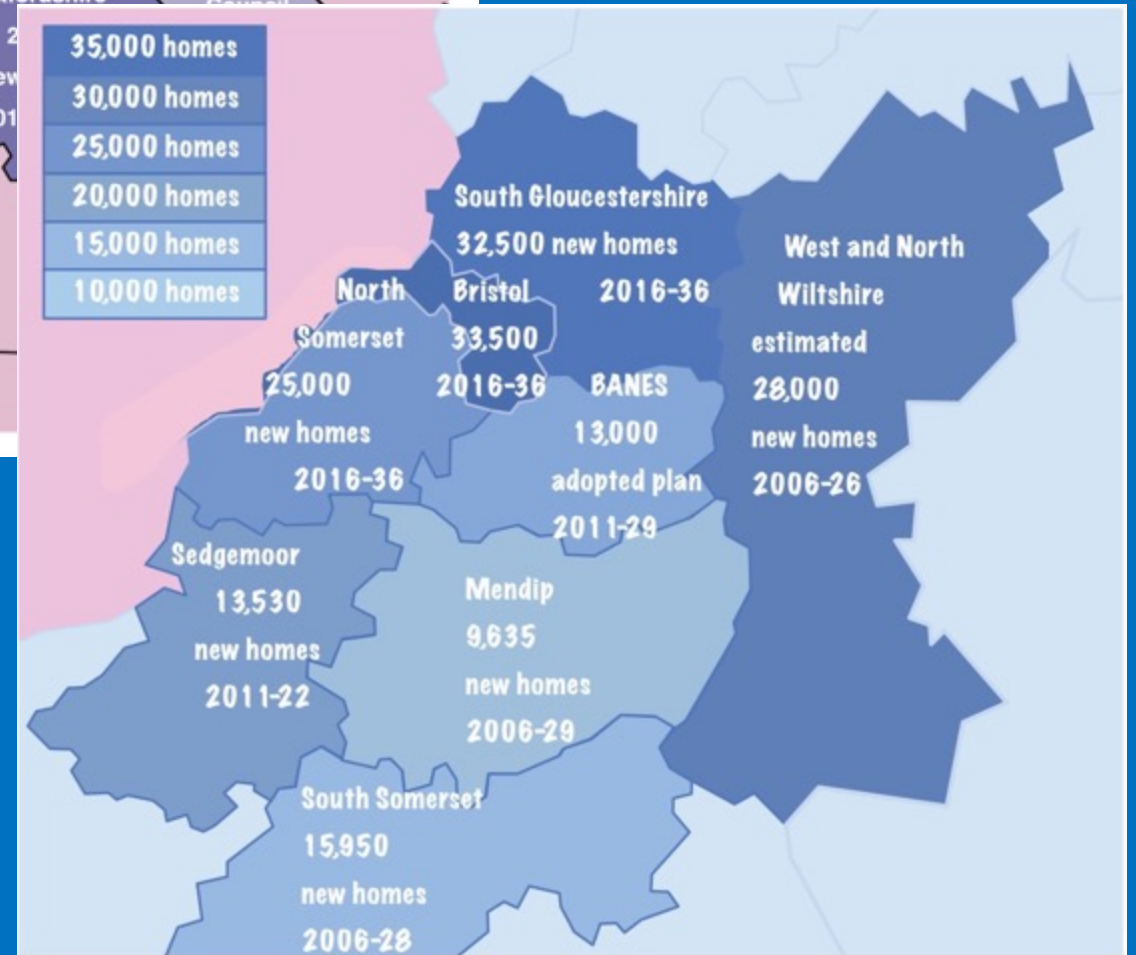
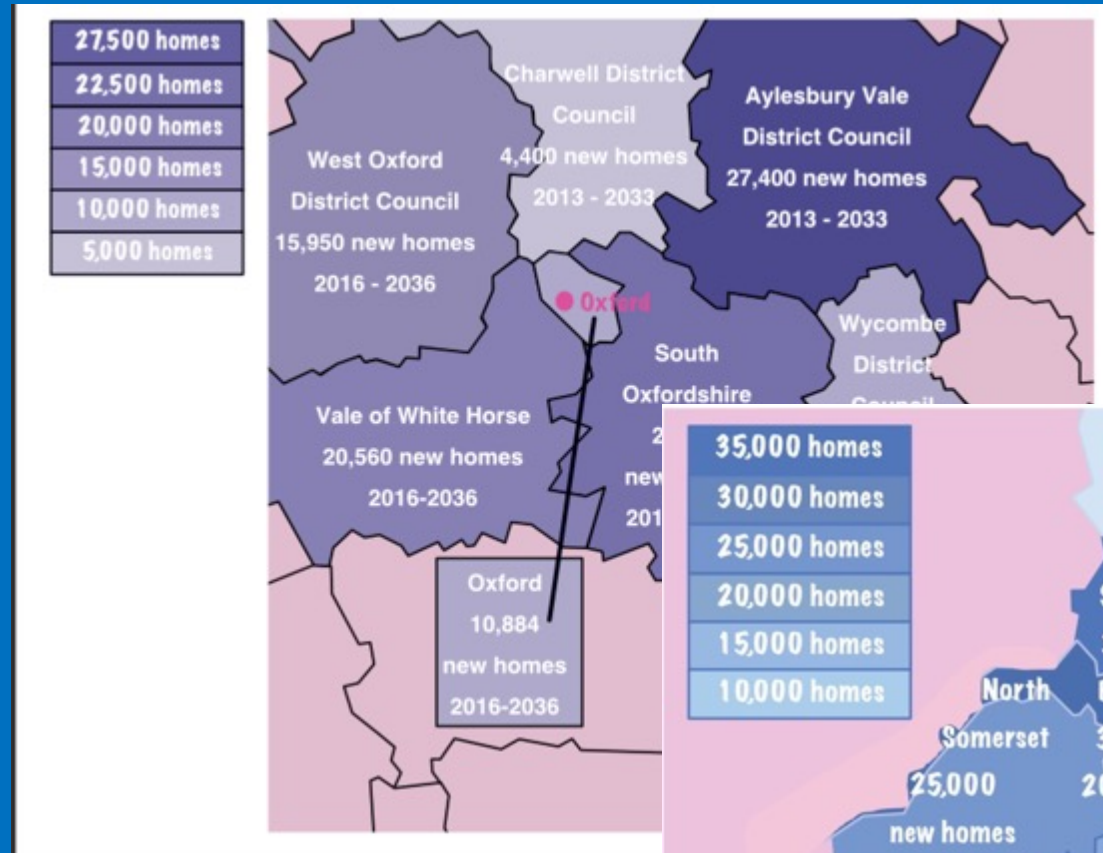
The message from local planners is that they have little control, and a lot of it is down to housing numbers required for their area.

Housing numbers and the five-year housing land supply are the main pieces in the planning game. This comes from government policy.



Our maps show examples of housing numbers in Local Plans. Have a look how high housing figures are cumulatively over an area, right into the countryside. Yet there is rarely a coordinated approach when it comes to where best to build or how.

The local authorities have to find land to build these numbers of homes, even if low density car-based sprawl is the inevitable result.



This example is from rural Oxfordshire



Core Policy 4: Meeting Our Housing Needs

South East Vale Sub-Area:

Settlement/ Parish	Settlement/ Type	Site Name	Number of Dwellings
Wantage	Market Town	Crab Hill ^c (North East Wantage and South East Grove)	1,500
Grove	Local Service Centre	Grove Airfield ^{c,d}	2,500
		Monks Farm (North Grove)	885
Harwell and Milton Parishes east of the A34 adjoining Didcot Town	Adjoining Didcot Town	Valley Park ^f	2,550
		North-West of Valley Park	800
Harwell	Larger Village	West of Harwell	200
Milton Parish west of the A34		Milton Heights (Smaller Village)	400
Sutton Courtenay		East of Sutton Courtenay	220
Sub total			9,055

Western Vale Sub-Area

Settlement/ Parish	Settlement/ Type	Site Name	Number of Dwellings
Faringdon	Market Town	Land South of Park Road, Faringdon ^c	350
		South-West of Faringdon	200
Great Coxwell Parish	Adjoining Faringdon Market Town	East of Coxwell Road Faringdon ^c	200
		South of Faringdon	200
Shrivenham	Larger Village	North of Shrivenham	500
Stanford-in-the- Vale		West of Stanford- in-the-Vale	200
Sub total			1,650

^c These sites have 'Resolution to Grant' planning permission subject to legal agreement as at Sept 2014

^d Saved Local Plan 2011 Allocation

Continued overleaf

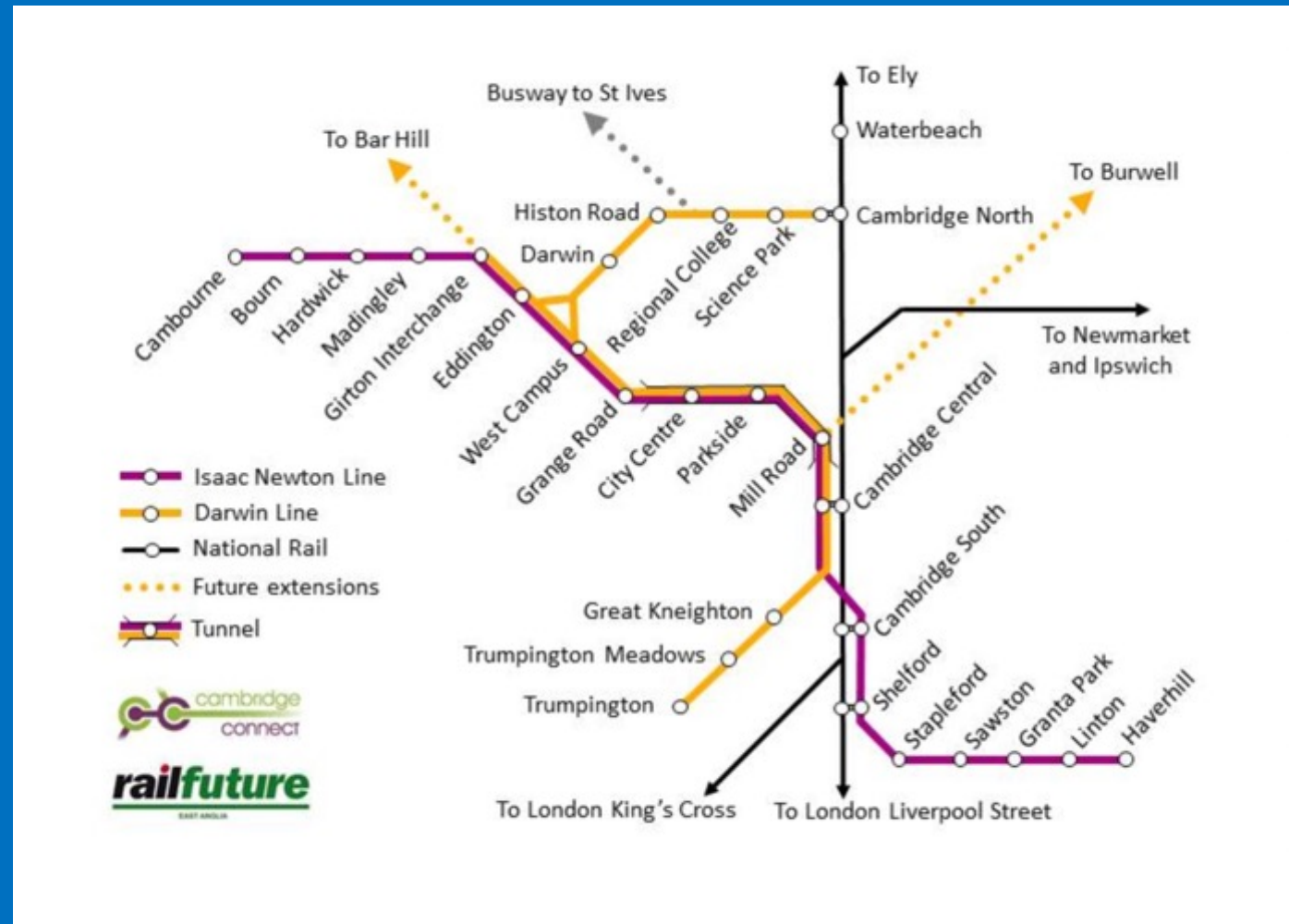
When high housing numbers are given to places that are mostly rural, fields and other countryside are generally selected for large-scale housing.



High housing numbers in rural areas very often means 'cowpat' development sites

How do you arrange for a series of 'cowpat' development sites to be nodes on a modern transit system? The answer is you can't. This notion of building around modern transit is not highlighted in the NPPF, in fact it almost rules it out.

Transit-orientated development?



Where do all these housing targets come from? Why are they so high in many rural areas? Why is public transport connectivity not considered?

The answer is complicated!

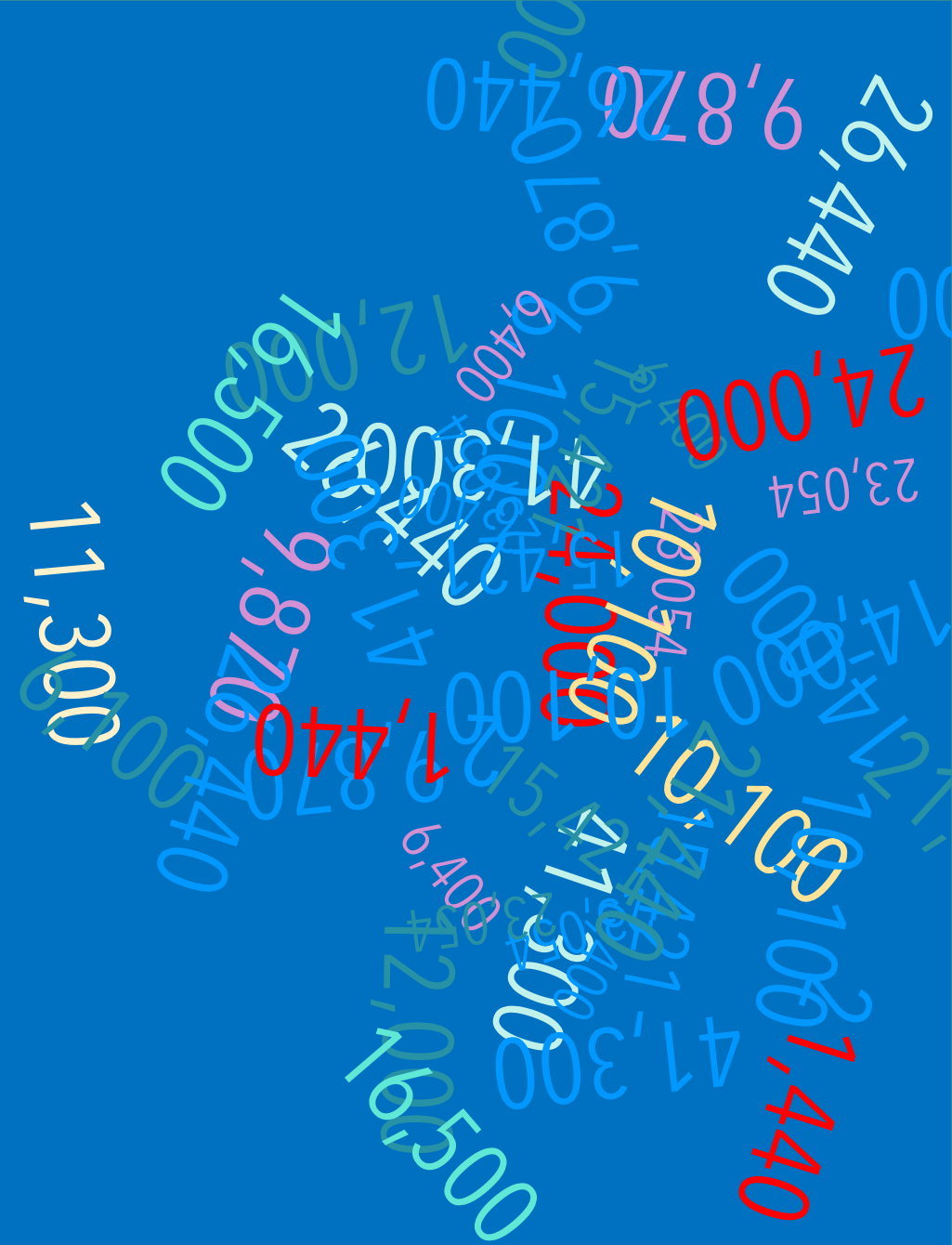
1. It begins with the national population growth predictions for England.
2. These are then translated to local 'sub-regional household growth' numbers (available online from DLUHC). These disperse future household growth across the country giving higher numbers to those local authorities that have been 'hot spots' for people moving there in the past.
3. A 'baseline housing need' is thus calculated for each local planning authority over a ten year period; for many rural areas this is high.
4. An algorithm is applied to the baseline. This is to increase the figures in unaffordable local authorities although there can be a 'cap' on numbers, eg. if nationally protected countryside are involved.
5. Then – since 2020 – a 35% uplift is then applied for those urban local authorities in the top 20 cities, although it does not appear that there is a consequent reduction in more rural places.



6. **Now comes the Local Plan.** The Local Plan must find enough reliable sites for 'housing need'. There is a 'call for sites' by the local authority and promoters and developers come forward with land to build on.
7. **There follows the 'site selection process'**, carried out as described in national planning policy (PPG) under 'Housing and Economic Land Availability Assessment'. Public transport is hardly if ever in the picture.
8. As part of land promotion, developers do **master-planning and marketing**, demonstrating how adverse environmental effects can be 'mitigated' and how local facilities and new road capacity in particular, might be financed.



9. On **transport** for greenfield sites, it's mostly about **traffic impacts** or new roads to open up the land and even double up as a bypass. There are 'Transport Assessments' and 'Environmental Statements' with complex modeling of the road network.
10. Chosen sites go into the **Local Plan** as 'housing allocations'. Major road schemes often have land safe-guarded.
11. here is then an outline planning application with all but the road access and the red line of the development left to 'reserved matters'.



1,300 hecatres each year in
additional to 1,300 times 5
as this is just 20%

= 6,500 hecatres a year
1 hecatre = 100 m²
10 by 10 = 1km square
= 100 hecatres
so 1000 hecatres is 1 square
km
so this is over 6.5 km square
per year developed
greenfield
in 10 years 65 km²

Overall conclusion...

There seems to be a lack of a comprehensive integrated approach to spatial planning in the NPPF or of stated transport priorities.

It's upside-down geography!

Housing targets given out of geographical context

Land put forward by developers and land-owners to satisfy targets

Say 'yes' to estates built in the wrong place and around the car, and away from major urban areas

The spend money on environmental 'mitigation' and new road capacity.

carbon

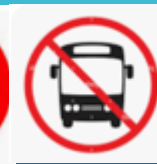
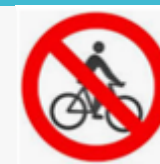
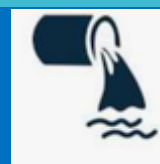
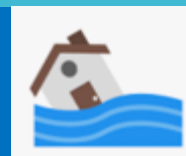
flooding

nitrates and phosphate pollution

biodiversity impacts

wrong place for sustainable transport

more traffic



Transport is considered far too late!!

What do we make of this? What changes in the NPPF can we ask for?

How can we make sustainable transport more centre-stage?

Let's get thinking and lobbying for change. What should be done? over to you!