



TRANSPORT FOR NEW HOMES

Transport for New Homes CIC

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Response to the Levelling-up and Regeneration Bill: reforms to national planning policy

Our main points

- Sustainable transport needs a much more central position in this policy document, including the way that transport shapes a place and life styles.
- The spatial distribution of new homes and other development needs to change to reflect Government aims to reduce carbon emissions from transport
- The importance of transit-orientated development in combination with land value capture as a way of extending urban areas, strengthening local economies, and environmental benefits, needs inclusion in national policy, especially with respect to ‘urban uplift’.
- The document needs to acknowledge that building new homes in association with new road systems is counterproductive in terms of traffic and car-based life styles, creation of low density sprawl, town and city centre vitality and the establishment of ‘beautiful’ places on account of the sheer quantity of parking and tarmac dominating the public realm.

Question 1 concerning the ‘right homes in the right places’. The use of sub-national population trends as the basis for housing targets, is insufficiently informed by a spatial strategy responding to climate change. High housing targets in areas that are rural or semi-rural increases the need to travel by car, yet at the same time offer few if any public transport alternatives, close by local facilities or choice of employment. The national trend to grow many areas of England that are comparatively rural, is already apparent from the Census 2021 results in *Population change between 2011 and 2021, local authorities in England and Wales* which shows (in Figure 3). The risk is that this trend will continue upwards, with implications for carbon from transport, and of course, more generally, for traffic.

Question 6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

There needs to be a much more sophisticated examination in terms of wider social and physical geography to find the best places to build, what to build, and who for. The undue emphasis of 'housing need' requirements generated by using statistical population trends, is counter-productive if we are to shape future places sustainably, applying modern principles in planning, sustainable transport, low carbon, and minimum environmental impact. We must not neglect the opportunities for considering coordinated development across wider areas in a truly sustainable way.

Question 7. Urban uplift.

The consultation proposes a 35% uplift in housing numbers for twenty urban centres (Birmingham, Bradford, Brighton and Hove, Bristol, Coventry, Derby, Kingston upon Hull, Leeds, Leicester, Liverpool, London, Manchester, Newcastle upon Tyne, Nottingham, Plymouth, Reading, Sheffield, Southampton, Stoke-on-Trent, and Wolverhampton). Lacking here is a policy that highlights that importance of new and improved public transport networks in these places. These may need to be upgraded and extended to new suburbs and satellite towns in tandem with new development, to mesh the whole area together, benefit accessibility and local economy and reduce traffic.

Question. 9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Not necessarily. The problems are two-fold. First there is a risk of 'green belt jumping' to unsustainable locations where new homes end up being built as they are now, around new roads and unsustainable travel, rather than as places connected by streets and modern mass transit systems to existing urban areas. Secondly in terms of density, the notion that one should not build at densities 'out of character' risks more of the low-density 'cowpat' is built, which compounds the situation. Higher density development done properly means walkable places, vibrant places and places that are great for public transport, so a blanket policy regarding density that is 'out of character' doesn't work – one needs to be more specific.

Question 10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

Low rise apartments European-style need to be a much more commonly chosen model, these orientated around streets, small-scale retail and businesses, and excellent public realm incorporating public transport, walking and cycling. Local

authorities should be encouraged to be much more creative when it comes to how and what might be built, and have the powers to do so in terms of site selection and master-planning, including reduced parking provision. Talking about density alone is too blunt a tool.

Q13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

Yes, but ask that sustainable transport is highlighted as essential to support connections across the wider area, including local rail, mass transit and so on, with public transport considered an integral part of place-making.

Question 14: What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

- There needs to be a way of several local authorities across an area to coordinate the delivery of new stations and mass transit systems, integrated with buses, as part of the growth of the wider area. These need to be part of Local Plans which need to address (local and wider) transport connectivity as much as they are about land-use.
- The counting of small and very small brownfield sites as part the strategic total. Small brownfield sites such as old unused garages, car parks, derelict industrial sites etc. etc. as part of the strategic total in a Local Plan. Homes England needs to be ready with funds to enable brownfield sites to be started, rather than support major road construction which opens up land inaccessible to sustainable transport.
- Transport for New Homes have highlighted in their reports on Car Dependency and Garden Villages: Vision or Reality how the current orientation of many new developments around the car not only puts traffic on our roads, but also locks residents into life styles that are not low carbon in terms of transport. As an alternative, transit-oriented development needs highlighting.

Question 15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

- A public transport strategic plan is needed for the wider travel-to-work area with resources and expertise in place to build the modern integrated public transport systems that are essential to support urban uplift, better places and economic growth. Central government needs to be fully on board with a new emphasis on funding local public transport as a priority if urban areas are to be expanded.
- In terms of future land value capture, CIL contributions to sustainable transport infrastructure will need to be coordinated over an area cross-boundary.

- We need to use open data standards in the production of GIS and other tools to visualise and understand interaction between different developments over a wide area including with reference to sustainable transport modes.

Q.33: Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

Yes, but we feel that the contribution of public transport, walking and cycling to placemaking needs to be made clearer. Public transport including new stations, mass transit stops and so on should be considered an essential element of placemaking. Stations new and existing should get a special mention in the LURB as 'hubs' with shops, kiosks, cafes and so on.

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