



URBAN TRANSPORT GROUP

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Consultation Response

Draft National Planning Policy Framework

Department of Communities and Local
Government

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1. Introduction

- 1.1. The Urban Transport Group (UTG) represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City region (Merseytravel), Tyne and Wear (NEXUS), the Sheffield City region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).

2. Response to questions

Q2. Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

- 2.1. A definition of sustainable development should be retained in the document rather than just flagged as a cross-referenced footnote to the UN general assembly. This enables the reader to understand “sustainable development” without having to search for other documents.
- 2.2. Object to the removal of the word “local” from the social role objective.
- 2.3. The inclusion of “accessible local services” has implications for the likely dominant mode of travel. This is crucial for the creation of sustainable development and supports the environmental role. “Accessible local services” implies the potential to avoid unnecessary transport investment and the aspiration for “accessible local services” will also be one of the driving objectives that supports sustainable land use decisions.

Q3. Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

- 2.4. These core principles are a useful summary and should not be removed – in particular the core principle relating to transport to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable” is not articulated as well as this in the revised transport chapter. If this section is to be removed, this principle should be transferred verbatim to the introduction of the transport section.

Q6. Do you have any other comments on the text of Chapter 3?

- 2.5. Paragraph 20 refers to “policies, and strategic site allocations, necessary to provide: ... d) infrastructure for transport, telecommunications ...” However, there is also a need for policies that promote land uses that capitalise on existing infrastructure to avoid the cost of providing new infrastructure. Plans also need to consider the ability and viability of providing transport “services”, not just transport “infrastructure”.
- 2.6. We would suggest removing “transport” from bullet d) and creating a new bullet that references the need to provide “patterns of growth that make the fullest possible use of public transport, walking and cycling, and that focus significant development in locations which are or can be made sustainable”
- 2.7. The requirement to identifying contributions expected in association with particular sites and types of development is particularly difficult to achieve in the case of transport interventions.



A significant amount of detailed investigation and transport modelling is needed to accurately identify the detailed interventions required to enable each site, and to establish the cost of interventions against which contributions would be required. This work is costly, time-consuming and challenging to keep up-to-date, and would be more appropriately undertaken collaboratively with site promoters rather than embedded in a 15 year plan.

Q16. Do you have any other comments on the text of chapter 6?

- 2.8. Local planning authorities should plan proactively to meet the development needs of business, and planning policies should also “identify priority areas for economic regeneration, infrastructure provision and environmental enhancement” rather than merely “seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”. The proactive approach will give greater certainty to developers and help prioritise scarce resources. The current wording implies that local authorities should seek to address all potential barriers to investment in all locations rather than having a strategic approach to investment locations.

Q18. Do you have any other comments on the text of Chapter 7?

- 2.9. Planning policies should do more than just “recognise” that residential development plays an important role in ensuring vitality of centres. The wording of para 86f) should be strengthened to encourage planning policies that actively promote town centre living in higher density well designed development, supported by green space and quality urban environments that make our town centres attractive locations to live.

Q21. Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

- 2.10. It is worth reiterating that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.
- 2.11. The first bullet point on paragraph 103 should be the main reason transport issues should be considered at the earliest stage. This is not that the potential impact of development on the transport networks can be addressed, rather it is about choosing the locations for development that can be most effectively served by existing public transport and will therefore need less up-front investment to make them sustainable.
- 2.12. As such, the following wording is suggested: “Transport issues should be considered from the earliest stages of plan-making... so that:
- 2.13. a) Land identified for development supports a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”
- 2.14. We also suggest edits to bullet c) in order to make it clear that it is not just “promoting” walking, cycling and public transport that is needed, rather these modes need to be enhanced and then promoted. Suggested edits are: “opportunities to enhance walking, cycling and public transport are identified, pursued and promoted”. The original wording implies that only a behaviour change approach is required.



- 2.15. In paragraph 104, should apply to the majority of development not just “significant” development and the second sentence should say “will be made sustainable” rather than “can be made sustainable”, as development should only be directed locations if there is a reasonable level of certainty that transport improvements are viable and will be delivered rather than just some theoretical possibility. The second half of this sentence should be “offering a genuine choice of sustainable transport modes” not just a genuine choice of transport modes
- 2.16. Paragraph 105:
- 2.17. a) could be shortened by deleting last eight words leaving just “Planning policies should: support an appropriate mix of uses across an area, and within strategic sites, to minimise the number and length of journeys needed.
- 2.18. b) suggest rewording to include reference to viability of transport investment... “Planning policies should: be prepared with local highways and transport authorities, transport infrastructure providers, transport operators, and neighbouring councils, so that viable strategies and investments for supporting sustainable transport and development patterns can be aligned.”
- 2.19. Paragraph 106 should make reference to the need for disabled parking provision and should also include a further point on “the suitability of locations for car-free development”
- 2.20. It is not clear whether paragraph 107 is seeking to promote accessibility to town centres for pedestrians and cyclists as an alternative to driving and parking... or whether this is meant to refer to cycle and pedestrian access to town centre car parks?
- 2.21. Paragraph 108 should incorporate the need to ensure the most accessible locations are chosen before those locations that would require expensive investment in infrastructure. Suggested rewording of a): “Locations served by existing sustainable transport networks are prioritised, and in other locations the opportunities to support new sustainable travel options are maximised, given the type of development and its location”
- 2.22. The revised wording in paragraph 109 is concerning. This states that development would need to have a severe impact on road safety before development can be refused. It is important to highlight that road safety is a material consideration, but a severe impact is clearly a highly inappropriate measure.
- 2.23. The phrase “residual cumulative impacts” needs clarifying. This can lead to developers arguing that a development that would lead to a large amount of additional traffic on an already highly congested road network is perfectly acceptable as it would not have a severe impact in terms of being measured by the current situation becoming much worse. However, if the current situation is already unacceptable, then even a modest worsening could be problematic in terms of economic, social and quality of life objectives.