



URBAN TRANSPORT GROUP

Consultation response

Planning for the future

Consultation on proposals for reform of the
planning system in England

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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).
- 1.2. This response is focused on the questions that are most directly related to transport and the interests of our members as strategic authorities for England's city regions.
- 1.3. In principal, reforms to the planning process are welcome. However, there is a lack of focus and recognition in the white paper of the role of transport in planning and the need to better join up transport and land use planning in order to ensure sustainable transport is prioritised in development.
- 1.4. There is clearly a recognition of the role that planning plays in sustainability more widely, but a lack of direct reference to the role of sustainable transport within this. Moreover, active and public transport can help to deliver many public policy goals, including improving public health, increasing access to opportunities and supporting inclusive growth, as well as delivering environmental benefits. Our 2019 report ['The place to be'](#) makes the case for 'transit-oriented development', which encourages developments that are supported by high quality public transport infrastructure and public realm that supports active travel for local journeys.

2. Response to questions

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

- 2.1. Simplification of the Local Plan making process is a positive step. However, it needs to be part of a wider move towards a strategic, city region led approach, which prioritises developments which can be delivered sustainably. Spatial planning at the city region level can identify sites that can be supported by high quality public transport, thus delivering a transit-oriented approach to new developments.
- 2.2. Overall, there is a lack of recognition of the role of transport in the planning process and the importance of integrating transport and planning to ensure that housing can be built in locations that support active and public transport. Without this, we will see further car-based sprawl, leading to more traffic and less sustainable lifestyles.
- 2.3. The white paper also needs to examine how public and active transport infrastructure will be funded in new developments.

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?

- 2.4. In principle, a consolidated test of "sustainable development" could streamline the planning process. However, details around what would be included in a sustainable development test are light, and this could result in a vague outcome that is difficult to implement and enforce. The current sustainability appraisal system in local plan making incorporates a broad set of



environmental criteria, including housing transport, biodiversity, carbon, flooding and water, criteria which would need to be retained in the consolidated test.

- 2.5. It is also unclear the extent to which sustainable transport, the use of public transport and support for walking and cycling would be prioritised as part of any sustainable development test.

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

- 2.6. Strategic planning across local authority boundaries is critical for delivering housing that is integrated with sustainable transport provision. Working at the city region level can help to deliver coordinated planning across a wider area, however, without the duty to cooperate opportunities to plan across boundaries could be lost.

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

- 2.7. Housing targets need to consider proximity to jobs, services and amenities alongside the provision, or potential to build new sustainable transport infrastructure. Without these considerations, housing targets could lead to further car-based sprawl.

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?

- 2.8. The outline plan stage includes transport, ecology, flooding and supply of utilities, so without this stage transport considerations risk being overlooked. Transport needs to be considered early on in the plan making process to ensure that sustainable transport options are available to residents and automatic outline permission puts that provision at risk.

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

- 2.9. Sustainable transport needs to be a priority for the planning process in all areas. New developments need to support walking and cycling for short journeys and public transport use for longer journeys with high quality, high frequency services. Too many new developments are built without sustainable transport provision and if we are to meet our Net Zero targets for carbon reduction we will need to increase the share of sustainable modes. The planning process is an important part of encouraging behaviour change.

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?

- 2.10. The principal that each authority should have a chief officer for design and place-making is positive and would help to build strategic capacity in our planning authorities. The RTPI have also made the case for each authority to have an officer responsible for climate proofing policy and development management, which we would support¹.

¹ <https://www.rtpi.org.uk/press-releases/2020/september/rtpi-calls-for-500m-boost-to-england-s-planning-system-in-csr-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?

- 2.11. A consolidated infrastructure levy is a good idea in principal to streamline raising of funds locally. However, it could result in trade offs between infrastructure traditionally funded through developer contributions such as affordable housing and transport schemes.

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

- 2.12. The Infrastructure Levy rates should be set locally or regionally, and dependant on infrastructure priorities at the local level.

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?

- 2.13. Where necessary, the Infrastructure Levy should be able to capture more value in order to support greater investment in infrastructure, including transport infrastructure, alongside affordable housing and supporting the local community.

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

- 2.14. Yes, local authorities should be able to borrow against the Infrastructure Levy in order to support infrastructure delivery including transport projects.

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

- 2.15. Yes, local authorities should have fewer restrictions over how the Infrastructure Levy is spent and greater freedom to prioritise locally important projects, including transport infrastructure.

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

- 2.16. Yes