

Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*)

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. *

Trade association, interest group, voluntary or charitable organisation

If you selected other, please state the type of organisation

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Please provide the name of the organisation (if applicable)

Campaign for Better Transport

Chapter 1: Introduction

Question 1

Do you have any comments on the text of Chapter 1?

We note the inclusion in para 6 of Ministerial statements and NIC-endorsed recommendations as a "material consideration" and do not object provided such recommendations have been subject to independent environmental assessment, density standards, etc. They should not be able to override key sustainable development requirements such as protection of the natural environment, promotion of healthy communities and prioritising sustainable transport. We therefore propose adding the words "where these are compatible with other NPPF policies." at the end of para 6.

Chapter 2: Achieving sustainable development

Question 2

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

Not sure

Please enter your comments here

We have no objection to a presumption in favour of sustainable development, provided that it is truly sustainable.

Sustainability requires reducing CO2 emissions which are currently off track for the 4th and 5th carbon budgets, particularly for the transport sector. We therefore propose adding at the end of Para 8c "and preventing net increases in CO2 emissions."

To achieve this, the NPPF must include not only protection of the natural environment but also selection of sites and layout of schemes based on integration of new developments with low carbon transport, access to public transport, walking and cycling, and reduced car dependency.

Our responses to later questions suggest wording changes that will help deliver such sustainable development.

Question 3

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?

Not sure

Please enter your comments here

No comment

Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

We strongly support inclusion of ancient woodland and aged trees as protected categories in paragraph 11, noting that these are unique habitats that cannot be reprovided elsewhere.

Chapter 3: Plan-making

Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

Not sure

Please enter your comments here

No comment

Question 6

Do you have any other comments on the text of chapter 3?

Engaging transport operators as well as infrastructure providers is essential for sound and sustainable development plans. We propose reflecting this in the wording of para 16c by adding “transport operators” after “infrastructure providers”. We would also recommend including user groups for different transport modes to ensure that provision meets their needs and therefore makes best use of land and resources.

Transport movements are separate to transport infrastructure: we therefore propose a new para 20 d) “a transport strategy for the movement of goods and people”, and to renumber the rest of para 20 accordingly.

In para 24, we propose adding the words “and transport networks” after “allocations” recognising the importance of transport networks to prioritising site allocation in strategic plans.

It is not only adjacent local authorities that may need to co-operate on plans given the trend to much wider travel-to-work areas. We propose reflecting this by adding the words “and within the same travel-to-work area” at the end of para 26.

We propose adding the word “transport” to para 35 so that this reads “relevant economic, social, transport and environmental objectives”. This will reinforce the integration of transport and land use planning that is essential for sustainable development.

Chapter 4: Decision-making

Question 7

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

No

Please enter your comments here

We believe that an open approach to viability assessments is to be encouraged.

Question 8

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

Not sure

Please enter your comments here:

No comment.

Question 9

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

We support the use of review mechanisms to capture the uplift in value from development, including transport infrastructure development.

Question 10

Do you have any comments on the text of Chapter 4?

We support the principle of agreeing infrastructure associated with new developments at pre-application stage (para 42) provided that this is in line with the priority for sustainable transport set out in para 103, including engagement with transport provider and operators.
We are concerned by a growing pattern that when new road schemes are delivered,

the associated sustainable transport provision (e.g. bus lanes, cycle routes) are being delayed or dropped on cost grounds, post-consent. We look to the NPPF to ensure that such sustainable transport infrastructure is made integral to new developments and not an optional extra.

We therefore propose amending para 42 to add the words “sustainable transport” after “infrastructure” so that it reads “infrastructure, sustainable transport and affordable housing”.

We note that many essential sustainable transport infrastructure may lie outside the site boundary, and therefore propose adding the words “and/or its sustainable transport links” to para 57b.

Chapter 5: Delivering a wide choice of high quality homes

Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

Para 68 we propose adding the word “accessibility” after “availability” in the criteria for site allocation, to tie in better with the sustainable transport policies in Chapter 9..

We note that minimising car parking provision makes best use of scarce land on small sites. We refer to our proposed amendment to para 107.

Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

Not sure

Please enter your comments here

We would support this subject to sites being suitable in terms of sustainable transport access. We propose the addition of the words “accessible and” to para 74 so that this reads “a supply of specific accessible and deliverable sites.

Question 13

Do you agree with the new policy on exception sites for entry-level homes?

Not sure

Please enter your comments here

We propose the addition of para 72 c) “are located close to public transport, walking and/or cycling routes and where there are good connections for these modes into the new development, or where new routes and services can be created to serve it” in line with the policies in Chapter 8 promoting healthy communities and Chapter 9 promoting sustainable transport. This would contribute to making such homes more affordable to first time buyers/renters by reducing car dependency.

Question 14

Do you have any other comments on the text of Chapter 5?

We understand the key aim of delivering more homes, more efficiently. We propose adding the words “and can be sustainably developed” after “where needed” in para 60 to tie this in clearly with the principles of sustainable development.

Chapter 6: Building a strong, competitive economy

Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

Not sure

Please enter your comments here

We propose adding the words “sustainable transport strategies” after “local industrial strategies” in para 83 a).

We propose amending para 85 to change “not well served by public transport” to “not already well served by public transport” reflecting the wording later in para 85 that such developments should “make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)”. We refer also to our comments on para 104.

Question 16

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

No comment

Chapter 7: Ensuring the vitality of town centres

Question 17

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

Yes

Please enter your comments here

We strongly support the strengthening of the sequential test to favour town centre and edge of centre sites that may not be immediately available ahead of available out of town sites (para 87).

We propose clarifying para 88 by adding the words “by sustainable transport” after “well connected to the town centre”.

Question 18

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

We propose adding a new para 86 g) “recognise that good quality public transport, walking and cycling provision play an important role in ensuring the vitality of centres and should be protected and enhanced in local plans” and renumber existing 86g) accordingly.

Chapter 8: Promoting healthy and safe communities

Question 19

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

We strongly welcome this new chapter. Such policies will contribute to a healthier and fitter community, reducing work absenteeism, and strengthening the local economy as well as helping to reduce long term health costs, and are fundamental for a resilient and prosperous economy.

We propose amending para 92c to delete the words “especially where this would address identified local health and wellbeing needs”: the policy supporting “provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling” would be of benefit to all communities and would make development designed on this basis more acceptable and therefore easier to deliver.

We propose adding “and their connection to sustainable transport” at the end of para 93e) to reinforce the integrated approach to planning different land uses and community facilities.

Question 20

Do you have any other comments on the text of Chapter 8?

We welcome the promotion of rights of way in para 99 and propose adding “and the National Cycling Network” to this section.

Chapter 9: Promoting sustainable transport

Question 21

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?

Not sure

Please enter your comments here

There is much to welcome in this revision. In particular we strongly support policies that "opportunities to promote walking, cycling and public transport use are identified and pursued" (para 103c), "the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for mitigation and for net gains in environmental quality" (para 103d) and that "the planning system should actively manage patterns of growth in support of these objectives" (first line of para 104).

To be effective, the NPPF must ensure that sustainable transport is considered during site allocation and throughout the planning process.

We propose strengthening the section by amending 103c to read "opportunities to promote and increase walking" and amending 103e to read "patterns of movement, particularly for walking and cycling".

Unfortunately this policy risks being undermined by the latter part of para 104 and by para 107.

Para 104: We urge deletion of the final sentence "However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making" as taking into account the variation between urban and rural areas is a general statement that should appear in para 79-81 on rural housing, if at all. In this section it risks being applied to negate the need to prioritise sustainable transport. Rural and suburban areas have great potential to be connected by bus routes and to cycle routes, bringing social, economic and health benefits. Such improvements should be integral to new developments and by bringing benefits to existing as well as future residents, tend to make such developments more acceptable and consents easier to approve. By contrast, heavily car-dependent developments requiring road building and generation of extra traffic are those most likely to stimulate opposition and be delayed in the planning system.

Para 105 a) we propose changing the words "within strategic sites" to "within development sites" to ensure that the benefits of sustainable transport apply to all schemes.

Para 105 c) we welcome the reference to travel choice and propose adding the words "and for high quality public transport [for example using the powers available

in the Bus Services Act]".

Para 105 d) we welcome the commitment to high quality provision and urge this be accompanied by guidance making clear what high quality means in this context (i.e. direct, convenient, safe, attractive and continuous routes prioritised over side streets and access).

Para 106 should be clarified by changing "parking" to "car parking" where appropriate. We recommend amending 106 e) adding "including e-bikes" and adding new f) "the need to ensure an adequate provision of cycling parking spaces".

Para 107: We urge deletion of the first sentence "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" and would support deletion of the entire paragraph.

Maximum car parking standards are an important tool for delivering the aims of the NPPF to maximise the delivery of new homes in appropriate locations, by supporting the sequential delivery of sites, encouraging densification, and making developments more acceptable to local communities by reducing parking pressures and traffic. This is reflected in para 122 on making best use of land and promoting sustainable travel modes that limit future car use. Transport-led developments, for example, new homes and workspaces around railway stations, are designed to have low parking provision, in support of densification. It is important that this approach is supported throughout the NPPF. Social trends, particularly in urban areas, show falling car use and car ownership and a fall in driving licence takeup. Congestion from excessive traffic volumes is undermining the economic performance of many towns and cities, in part by undermining the viability of commercial bus services. .

It is reasonable to allow local plans to reflect this context in setting maximum car parking standards for their areas

Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

No

Please enter your comments here

We do not support reliance on or expansion of aviation facilities, given the need to reduce CO2 emissions from the transport sector. Expanding aviation activities will generate additional noise and other adverse environmental impacts on surrounding communities, inhibiting the development and desirability of new homes, which is contrary to the primary goal of the revised NPPF.

Question 23

Do you have any other comments on the text of Chapter 9?

We propose rewording para 109 to make this a clearer and more useful test:

“Development should only be prevented or refused on highways grounds if the residual cumulative impacts on traffic congestion or road safety would be severe and are not addressed by sustainable transport proposals.”

We strongly support the sustainable transport hierarchy set out in para 110, promoting walking and cycling and public transport in the design of developments. There is a powerful interplay between such design and the viability of sustainable transport. Permeability for pedestrians and cyclists through developments is important for reducing distances and increasing access, while high density provision ensures that public transport provision such as bus services is commercially viable.

Para 110 d): we urge the insertion of the words “prioritising sustainable modes” after “the efficient delivery of goods”, to ensure a consistent policy throughout.

We support provision for electric charging as noted in 110e), and would add that this should include provision for e-bikes: any charging provision should be located so as not to compromise walking and cycling infrastructure.

We support the requirement for travel plans in para 111, and recommend that this be accompanied by guidance on the measures that a travel plan could include, such as public transport integration, cycle facilities, sustainable travel information and behaviour change programmes, as well as guidance on travel plan implementation and monitoring. We further note that all developments should seek to minimise the impacts of construction traffic, for example with construction traffic management plans including agreed delivery times, HGV routing and safety standards.

Chapter 10: Supporting high quality communications

Question 24

Do you have any comments on the text of Chapter 10?

We support the expansion of electronic communications networks (para 112) while minimising the number of masts (para 113). This makes a positive contribution by reducing the need to travel and enabling better access to real time travel information for passengers and service operators.

We suggest adding wording to the end of para 113 “and aligned with transport corridors, to minimise intrusion into sensitive landscapes and maximise the connectivity benefit.”

Chapter 11: Making effective use of land

Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

Not sure

Please enter your comments here

We strongly support densification and making best use of under utilised land particularly around transport hubs, or as mixed use developments that will reduce the need for long distance home-to-work travel. However this must not be at the expense of land safeguarded for public transport infrastructure and multi-modal interchanges for passengers and freight which are necessary to deliver the sustainable development aspirations of the NPPF. Current rail freight sites, including a small number of locations for future development should be safeguarded particularly in urban centres, rather than earmarked for other uses. Therefore we propose adding the words “while safeguarding passenger and freight interchange sites” at the end of para 118d.

Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

Yes

Please enter your comments here

We strongly support making more intensive use of existing land and buildings and pursuing higher density housing in accessible locations. There is a virtuous circle of higher density developments both benefiting from and supporting sustainable transport, for example by making bus services more viable.

We welcome para 123 wording “that it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”.

We support minimum density standards and note the positive contribution that maximum car parking standards make to achieving density. We propose amending para 123 to read “These standards should seek a significant uplift in the average density of residential development within these areas, including setting maximum car parking standards, unless it can be shown that there are strong reasons why this would be inappropriate”.

Question 27

Do you have any other comments on the text of Chapter 11?

We welcome the reference to the positive contribution that reducing car dependency makes to delivering high quality, high density housing (para 122c) and strongly welcome taking into account “the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use” when prioritising sites for development. We believe this should also be reflected in para 107.

Chapter 12 : Achieving well-designed places

Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

We welcome the emphasis on place-making and good quality design. Sustainable transport particularly provision of high quality public realm, walking and cycling facilities makes a very positive contribution to placemaking, which should be recognised in this chapter.

This section should also reflect Government policy that walking and cycling should be the norm for shorter journeys.

Question 29

Do you have any other comments on the text of Chapter 12?

Under para 124 we would change “ high quality buildings and places” to “high quality buildings, infrastructure and places

Under para 126 e) we would change “transport” to “sustainable transport”.

Under para 126 f) we would change “accessible” to “accessible by active travel”

Chapter 13: Protecting the Green Belt

Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are ‘not inappropriate’ in the Green Belt?

Not sure

Please enter your comments here

We support the principle that development should be concentrated around transport hubs and that housing sites, whether currently in Green Belt or not, should be prioritised on the basis of their access to good quality public transport, walking and cycling provision (para 136b).

We propose amending the following line in para 137 “that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport” to read “that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and is or can be well-served by public transport”.

We do not object in principle to the greater use of brownfield land for housing in the Green Belt, but note that often such sites (eg former airfields) are poorly served by public transport. Whether in the Green Belt or not, such sites should only be brought

forward if they have good access to public transport, walking and cycling facilities.

In line with this, we propose clarifying para 145c) by addition of the word “sustainable” in front of “transport infrastructure”.

Question 31

Do you have any other comments on the text of Chapter 13?

We support moves to promote renewable energy, including para 146: having sufficient generating capacity is essential for meeting demand for future transport electrification while achieving CO2 reduction targets.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Question 32

Do you have any comments on the text of Chapter 14?

The UK CCC has identified the transport sector as being off-track in meeting future carbon budgets. Therefore transport should be explicitly referenced in this chapter as required to meet the UK’s international obligations and the Climate Change Act 2008.

Para 147 – We strongly support the emphasis on moving to a low carbon future, and would add “support the use of low carbon transport and associate infrastructure, and reduce the overall need to travel” .

Para 149 – We advocate addition of a new para 149 c) “promotes access to and use of sustainable transport modes, and limits infrastructure which increases car dependency and carbon emissions”.

Para 153 - We support moves to support provision of renewable energy infrastructure: having sufficient generating capacity is essential for meeting demand for future transport electrification while achieving CO2 reduction targets. We are not clear why wind energy is subject to greater requirements for community support than any other form of energy infrastructure, and accordingly recommend deleting footnote 40.

Para 163- We strongly support the inclusion of sustainable drainage systems (SuDS) in the NPPF and would remove the word “major” so that SuDS become the norm for all developments.

Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

Yes

The paragraph should be strengthened to reflect the impact of associated transport emissions: for example, adding “location, including access to transport”. We also favour the addition of a new para 149c) as noted above.

Chapter 15: Conserving and enhancing the natural environment

Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

Yes

Please enter your comments here

We welcome aligning the NPPF with the goals of the 25 Year Environment Plan, in particular achieving targets on clean air, biodiversity, landscape protection and action on climate change, applying these as much to infrastructure as to buildings. We strongly support minimising impacts and providing net gains for biodiversity. (para 168d)

We strongly support maintaining and strengthening networks of habitats and green infrastructure (para 169).

We strongly support strengthening protection for National Parks, AONBs and other areas of environmental importance and that the scale and extent of development within these designated areas should be limited and permission should be refused for major development other than in exceptional circumstances (para 170).

Accordingly, we do not support the removal of the phrase ‘which have the highest status of protection in relation to landscape and scenic beauty’ in the first sentence of paragraph 170. It is essential that this phrase is reinstated in order to ensure that there is no doubt that additional planning protections continue to apply in National Parks.

We strongly support inclusion of ancient woodland and aged trees as protected categories in paragraph 173c, noting that these are unique habitats that cannot be reprovided elsewhere. However we are concerned that footnote 49 is at best superfluous and at worst only serves to undermine this protection. We therefore propose deleting this footnote.

Question 35

Do you have any other comments on the text of Chapter 15?

We strongly support para 179 requiring alignment of development plans with air quality plans, and the role of traffic management in making a positive contribution to

such plans.

Chapter 16: Conserving and enhancing the historic environment

Question 36

Do you have any comments on the text of Chapter 16?

We strongly support the revision of para 182 to clarify that World Heritage Sites are recognised internationally for their Outstanding Universal Value and that this forms part of their significance and should be taken into account.

We welcome the revision of para 189 to clarify that when considering the impact of a proposed development on a designated heritage asset, decision-makers should give great weight to the asset's conservation irrespective of whether the potential harm to its significance amounts to 'less than substantial harm' or 'substantial harm or total loss' of significance .

We are concerned about the conflation of World Heritage Sites with Conservation Areas in paras 196 and 197. World Heritage Sites are of international importance and are designated for the whole area having Outstanding Universal Value, which requires the area as a whole to be safeguarded. We urge removing the references to World Heritage Sites from these paragraphs.

Chapter 17: Facilitating the sustainable use of minerals

Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

We support the need to safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals. In line with the NPPF's commitment to sustainable development and sustainable transport, we propose adding the words "prioritising those served by rail or water" at the end of para 200e). Where road-based servicing is unavoidable, we would like to see a requirement for safe HGV routing and operations.

Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

Not sure

Please enter your comments here

No comment

Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

Not sure

Please enter your comments here

No comment

Transitional arrangements and consequential changes

Question 40

Do you agree with the proposed transitional arrangements?

Not sure

Please enter your comments here

No comment

Question 41

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

No comment

Question 42

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

No comment

Glossary

Question 43

Do you have any comments on the glossary?

No comment