



Chartered Institution of Highways and Transportation Submission to the Ministry of Housing, Communities and Local Government's Planning for the future consultation.

CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Our vision is for world-class transportation infrastructure and services. Our values are to be Professional, Inclusive, Collaborative and Progressive.

CIHT understand the main purpose for this consultation is to implement the recommendations of the Building Better Building Beautiful Commission and to introduce the National Model Design Code. However, the consultation has limited scope and CIHT look forward to the opportunity to comment on a on comprehensive update on the NPPF as part of wider government planning reforms. CIHT's *has expressed it's* concerns in our *response* to MHCLG's Planning for the Future White Paper response¹ which still stand.

This response will focus on National Model Design Code and revisions to Chapter 9 of the NPPF in terms of sustainable transport.

The integration of planning and transport plays a fundamental role in making development sustainable by putting it in the right places needs to be recognised throughout the document and therefore that the document should be clear on the criteria for siting development.

The choice and availability of sustainable travel choices is a key factor for sustainable development. This needs to be a fundamental part of the planning process and recognise that transport authorities and operators need to be involved throughout the planning process. By involving them from initiating the local or strategic plan to the determination of planning applications they become part of the solution rather than a hurdle to be overcome.

National Planning Policy Framework

CIHT's consultation response focuses on revisions to chapter 9 of the NPPF. CIHT look forward to an opportunity to respond to a more comprehensive revision of the NPPF as part of wider government planning reform.

Chapter 2: Achieving sustainable development

Q1. Do you agree with the changes proposed in Chapter 2?

Chapter 3: Plan-making

Q2. Do you agree with the changes proposed in Chapter 3?

Chapter 4: Decision making

Q3. Do you agree with the changes proposed in Chapter 4? Which option relating to change of use to residential do you prefer and why?

¹ CIHT response to MHCLG's Planning for the Future, <https://www.ciht.org.uk/media/12351/planning-for-the-future-ciht-submission.pdf>

Chapter 5: Delivering a wide choice of high quality homes

Q4. Do you agree with the changes proposed in Chapter 5?

Chapter 8: Promoting healthy and safe communities

Q5. Do you agree with the changes proposed in Chapter 8?

Chapter 9: Promoting sustainable transport

Q6. Do you agree with the changes proposed in chapter 9?

The proposed changes to chapter 9 are very minor in nature. Revisions to the NPPF need to ensure that the requirement for sustainable transport provision not only features in some policy statements but is consistently and coherently underpinning decision-making throughout – e.g. the location of development; the way development is accessed; changes to the basis of refusal of applications (removal of key current statements on “severe” etc. as in the current NPPF); the need for net gains in sustainable transport provision.

The choice and availability of sustainable travel choices is a key factor for sustainable development. This needs to be a fundamental part of the planning process and recognise that transport authorities and operators need to be involved throughout the planning process from initiating the local or strategic plan to the determination of planning applications, thereby becoming part of the solution rather than a hurdle to be overcome.

A recent survey of CIHT members active in the sector showed that 80 percent of respondents thought that revisions to chapter 9 were not strong enough in order to promote sustainable development².

The weak wording of chapter 9 is now inconsistent to the strong line in Chapter 2 paragraph 11 that ‘all plans 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’.

CIHT would encourage the chapter to be renamed from ‘promoting’ sustainable transport to ‘Providing’ sustainable transport.

Paragraph 103 should be amended to ensure that sustainable transport is considered during ‘site identification, construction and use of a new development.’

Paragraph 103 (a) should be amended to say, “the potential benefits of sustainable transport networks can be realised for new developments”. CIHT believes that by looking at the negative impacts of new developments and then seeking to ameliorate them we are not fully realising the benefits of transport for people and place.

Paragraph 103 (c) should be amended from “opportunities to ‘promote’ walking, cycling and public transport use are identified and pursued.” To “opportunities to ‘maximise’ walking, cycling and public transport use are identified and ‘provided for’.”

Paragraph 103 (d) should refer to ‘local and national’ environmental impacts to highlight that wider government obligations over climate change and air quality should influence planning decisions.

² CIHT webinar: [MHCLG and DfT present National Planning Policy Framework and National Model Design Code: consultation proposals \(ciht.org.uk\)](#) – held on 12 March 2021 and attended by 185 delegates

Paragraph 104 should be amended to delete the 'significant' as all development should aim at being sustainable and the NPPF should be a key tool in ensuring that the right homes are built in the right places and through limiting the need to travel and offering a genuine choice of travel modes.

Paragraph 105 (c) should consider whether 'widen transport choice' is the correct phrasing as certain developments particularly with dense housing may want to limit transport choice, particularly when it comes to private car usage.

Paragraph 105 (d) could refer to proper facilities for bus services as these may be important to the design of the development. For example having roads wide enough for buses; limited street parking; well designed bus stops that are linked to the walking network. This is hinted at in paragraph 11 (a) but again the wording is weak by only 'encourage' public transport use and should be changed "prioritising" public transport use.

Paragraph 106 should be inclusive of parking for cycles.

Paragraph 106 should recognise that managing parking is a key part of managing demand. The network management impact should be addressed when creating local parking standards.

Paragraph 106 (e) should specify that it is the ability to charge electric vehicles that is relevant rather than the number of spaces available. There have been chargers installed in new developments which share a single power supply between multiple cars. This fulfils planning requirements for spaces but can result in vastly increased charging times and make electric car use an unattractive option.

Paragraph 107 should be removed. While CIHT supports developments providing suitable and realistic levels of parking for residents ³maximum parking standards are an important part of managing local transport strategy. In town centres, there may be reasons apart from network management to enforce maximum parking standards.

Paragraph 109(c) should include Manual for Streets for the reasons we have identified in our response to the National Model Design Code and copied below.

CIHT strongly welcome that Manual for Streets is highlighted as key guidance in the National Model Design Code and is pleased to be working with both the Department for Transport and the Ministry of Housing, Communities and Local Government to develop a revised version which will incorporate content and principles from both MfS and MfS2.

However, to ensure high uptake of the principles in Manual for Streets its position must be strengthened and should become clear government policy. By doing this local authorities, developers, the planning Inspectorate, and professionals engaged in developing better places will have to use the guidance. The importance of Manual for Streets in creating better places has been recommended by a number of key reports.

- The House of Lords Select Committee on National Policy for the Built Environment - Building Better Places⁴ recommended the use of Manual for Streets by all local authorities.

³ CIHT residential parking guidance note, https://www.ciht.org.uk/media/4395/guidance_note_-_residential_parking.pdf

⁴ <https://publications.parliament.uk/pa/ld201516/ldselect/ldbuilt/100/100.pdf>

- Strengthening Manual for Streets position was a specific recommendation in the Building Better, Building Beautiful Commission's report⁵
- The Cabinet Offices Policy Lab carried out a scoping study into the use of MfS in 2019 and amongst its recommendations said *DfT & MHCLG should align MFS3 with the NPPF. There is the opportunity to make MFS3 one of three types of guidance which sit underneath the NPPF along with Planning Policy Guidance and Visual Guidance.*
- UCL's housing Audit⁶.

Paragraph 111(c) should include inclusive in the description of places.

Paragraph 112 Should add measures to ensure that travel plans are implemented and the impacts assessed against the plan.

National Model Design Code

Q15 We would grateful for your views on the National Model Design Code, in terms of

a) The content of guidance

CIHT welcome the development of the National Model Design Codes and that the codes recognise the importance of travel. However, the wider planning process lacks focus on sustainable transport. CIHT recognise that responses to MHCLG's planning white paper are still being considered as part of the planning reform process and we look forward to responding in more detail in any future consultation.

CIHT believes that SUDs *and drainage* should be given more prominence throughout the NMDC guidance. Currently SUDs and drainage are pigeon-holed to the nature categorisation. SUDs and drainage are an overarching issue that should be considered in all aspects of urban design.

b) The application and use of the guidance

Manual for Streets (MfS), produced by the Department for Transport (DfT) in 2007, and Manual for Streets 2 (MfS2), produced by CIHT in 2010, have become the standard reference guidelines for the development of sustainable street design. They have promoted the consideration of all modes of transport, alongside car use in the design of public space and are well respected in the sector.

CIHT strongly welcome that Manual for Streets is highlighted as key guidance in the National Model Design Code and is pleased to be working with both the Department for Transport and the Ministry of Housing, Communities and Local Government to develop a revised version which will incorporate content and principles from both MfS and MfS2.

However, to ensure high uptake of the principles in Manual for Streets its position must be strengthened and should become clear government policy. By doing this local authorities, developers, the planning Inspectorate, and professionals engaged in developing better

5

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf

⁶ A housing audit for England, UCL (2020) <https://www.ucl.ac.uk/news/2020/jan/new-housing-design-england-overwhelmingly-mediocre-or-poor>

places will have to use the guidance. The importance of Manual for Streets in creating better places has been recommended by a number of key reports.

- The House of Lords Select Committee on National Policy for the Built Environment - Building Better Places⁷ recommended the use of Manual for Streets by all local authorities.
- Strengthening Manual for Streets position was a specific recommendation in the Building Better, Building Beautiful Commission's report⁸
- The Cabinet Offices Policy Lab carried out a scoping study into the use of MfS in 2019 and amongst its recommendations said DfT & MHCLG should align MFS3 with the NPPF. There is the opportunity to make MFS3 one of three types of guidance which sit underneath the NPPF along with Planning Policy Guidance and Visual Guidance.
- UCL's housing Audit⁹.

A recent survey of CIHT members also indicated a strong desire for strengthening Manual for Streets position (76% of respondents said MfS should be mandatory)¹⁰.

This could be achieved through putting greater emphasis on Manual for Streets and the National Model design code in the National Planning Policy Framework **or by making it Statutory guidance.**

To support Manual for Streets strengthened position, the government must fund and support a Training and Dissemination programme that increases skills and capability in Local Authorities and the Highways and Transportation sector. Without investment into the skills and capability needed to implement Manual for Streets professionals in both the public and private sectors will continue using outdated methods that lead to poor and unsuitable design.

c) The approach to community engagement

There is a clear need to improve the way Communities are involved in the development of sustainable places. The transport implication of development needs to be clearly identified as part of the planning process. The Royal College of Art project along with CIHT and TPS are working on a project that can be used as a new way forward in terms of community engagement.¹¹ Any form of community engagement however takes substantial time to be effective as being clearly demonstrated through this project with three communities.

⁷ <https://publications.parliament.uk/pa/ld201516/ldselect/ldbuilt/100/100.pdf>

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf

⁹ A housing audit for England, UCL (2020) <https://www.ucl.ac.uk/news/2020/jan/new-housing-design-england-overwhelmingly-mediocre-or-poor>

¹⁰ CIHT webinar: [MHCLG and DfT present National Planning Policy Framework and National Model Design Code: consultation proposals \(ciht.org.uk\)](https://www.ciht.org.uk/news/2021/mar/mhclg-and-dft-present-national-planning-policy-framework-and-national-model-design-code-consultation-proposals) – held on 12 March 2021 and attended by 185 delegates

¹¹ Our futures: our future journeys. Royal College of Art, (current project underway) <https://tps.org.uk/public/downloads/WXtya/Imagining%20the%20future%20together%201st%20press%20release%20200731.pdf>