

1. SUMMARY

1.1 Transport can have a major impact on the beauty and tranquillity of the countryside - whether through land take, signage clutter, light pollution or noise - but it is also essential for a living countryside in which people can get on with their daily lives.

1.2 The National Planning Policy Framework (NPPF) has reduced transport policy considerably. While one of the NPPF core planning principles calls for the 'fullest possible use' of walking, cycling and public transport, elsewhere it is stated that developments should not be refused on transport grounds 'unless the residual impacts are severe'. The combination of less detail and apparently contradictory policy means the NPPF in relation to transport is not easy to interpret. Numbers in parentheses below refer to NPPF paragraphs.

2. TOP TIPS

- Ensure that local land use and transport planning are effectively integrated, particularly where your local plan proposes development should occur. Major development should be focused where there is good public transport access and densities should be high enough to support local shops and other facilities within walking distance. This approach is sometimes known as 'smart growth' - see the further information section for a link to smart growth principles.
- Check your Local Transport Plan (LTP) which sets out transport policies and proposals. Be aware that in areas where there are two tier authorities, the upper tier authority will be responsible for transport and the lower tier authority for planning. Check the LTP timetable to find out about opportunities to influence it.
- The NPPF calls for 'fullest possible use' of public transport and physically active travel. Bus use and cycling in particular make up a smaller proportion of journeys in the UK compared to other northern European countries. So work out how much these forms of travel could realistically grow over time - see the 'modal shift' sub-section below.

PLANNING CAMPAIGN BRIEFING SERIES:

1. Development Plans
2. Green Belts
3. Housing
4. Energy Infrastructure
5. Transport
6. Heritage and Design
7. Light Pollution
8. Rural Economy
9. Economic Development and Town Centres
10. Wider Countryside and Protected Areas
11. Tranquillity
12. Minerals

We welcome case studies and feedback to inform future versions of these briefings.

(E mail to info@cpre.org.uk)

3. CHANGES AT A GLANCE

PRE REFORM (PPG 13)	LOCALISM ACT / NPPF / PLANNING PRACTICE GUIDANCE
Regional Transport Strategies and Regional Strategies set strategic transport priorities and policies.	Regional Strategies revoked. Duty for local planning authorities and highway authorities to co-operate, including across travel to work areas (31, 180). Local Transport Boards prioritise national funding but are non-statutory and not subject to this duty.
Promote accessibility and reduce the need to travel, particularly by car.	Transport policies should seek to favour sustainable development but this is caveated with recognition that opportunities to maximise sustainable transport will vary depending on the type of area (29)
Maximum parking standards to promote sustainable travel, reduce congestion, allow schemes to fit into constrained sites and reduce land-take of development	Setting parking standards is optional for local planning authorities (39). Parking enforcement and charges should be proportionate (40)

4. BACKGROUND

4.1 The purpose of this briefing is to assist understanding of the reforms to the town and country planning system introduced by the Localism Act 2011, the NPPF (March 2012) and National Planning Practice Guidance (NPPG - March 2014). It outlines the main changes and the issues to be aware of (Analysis) and advises on specific campaign topics (Campaign Advice).

4.2 The new emphasis on localism is likely to lead to a much wider variety of local planning policies and decisions. These decisions will determine the impact of the planning reforms. CPRE is keen to ensure that our precious countryside continues to be protected and valued, and to highlight significant threats to it where they arise. We will collect evidence of outcomes (good and bad), in the form of cases that illustrate the issues we highlight. We welcome volunteer and public assistance with this, as well as feedback on this briefing.

5. WHAT ISSUES ARE YOU LIKELY TO FACE?

5.1 The core planning principle relating to transport call for plan-making and decision-taking 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' (17). While Welsh and Scottish planning policy call for 'modal shift' to sustainable modes of transport, the NPPF is much weaker on this. In particular, there is no policy to encourage freight off the roads onto rail or water.

5.2 The transport section starts with a call to 'balance the transport system in favour of sustainable transport modes' (29). Sustainable transport modes are defined in the glossary as '[a]ny efficient, safe and accessible means of transport with *overall* low impact on the environment' [emphasis added] and this is explicitly defined to include low emission cars. Not only does this focus on carbon emissions fail to reflect the three dimensions of sustainability set out at the start of the NPPF, it hard to see how it could be workable. A low emission car is not a different mode of transport to a normal car. In any event, during the time period covered by local plans and lifetime of particular developments, technology is likely to improve so what might now be considered a low emission car would become a high emission one.

5.3 The relevant policies in the transport section about orienting development towards public transport are heavily caveated with phrases such as 'where reasonable to do so' (29-32, 34-35). There is nothing at all about maximising the benefits of higher accessibility through requiring development to be at higher densities - a key principle of 'smart growth'. It is stated that development should only be able to be refused on transport grounds where the impacts are 'severe' (32). This is likely to assist developers in arguing against refusals based on traffic impacts.

5.4 National parking maxima are abolished and setting local parking maxima has become optional. Suggested criteria for drawing up to local car parking standards are set out (39). PPG13 supported restrictions on parking as part of demand management to encourage use of other forms of transport. Recent research by the Department for Transport suggests that parking restrictions are one of the most effective means of influencing travel behaviour but this was not taken into account in the NPPF's Impact Assessment.

5.5 In comparison with the climate change section which calls for the planning system to deliver 'radical reductions in greenhouse gas emissions' (93), the transport section is rather vague and suggests 'encouragement (of) solutions which support reductions in greenhouse gas emissions' (30). Given that the transport sector has shown the least progress in decarbonisation, this suggests there may be a conflict between the NPPF policies in these different areas.

Additional guidance

5.9 The NPPF has resulted in a loss of significant detail on transport, with whole areas such as freight and airfields only having the briefest mention. A particular issue is that there is a lack of content about plan-making and transport: the focus is on transport and decision-taking. Additional guidance is available in the NPPG particularly in the guidance on climate change, which stresses the need for plan-making to test different spatial options so as to maximise the potential of sustainable transport ([ID: 6-007](#)). Updated guidance from DfT on Travel Plans and Guidance on Transport Assessment is due though at present it is unclear when this will be published.

Design and street layouts

5.6 In relation to the location and layout of new developments, the NPPF sets out objectives of ‘avoiding street clutter’ and ‘where appropriate establishing home zones’ (35). This is welcome but could equally be applied to existing developments. The objective ‘to consider the needs of people with disabilities’ falls well short of the legal requirement, now contained in the Equality Act 2011, to make reasonable adjustments for people with disabilities. There is a wealth of useful guidance in the design section of the NPPG, in particular ‘Are there design issues that relate to particular types of development’ ([Reference ID: 26-39 to 26-042](#)) and ‘Planning should promote safe, connected and efficient streets’ ([Reference ID: 26-008](#)).

Nationally Significant Infrastructure Projects

5.7 The Planning Act 2008 created a special procedure as an alternative to public inquiries for Nationally Significant Infrastructure Projects (NSIPs), including for motorways, trunk roads, railways, rail freight interchanges (RFIs) and large port and airport expansion. The thresholds for road and railway schemes were raised in 2013 though smaller schemes can still be designated as NSIPs by ministers.

5.8 National Policy Statements (NPS) set out the policy context for NSIP decisions. At the end of 2013, the DfT published a draft NPS on National Networks (covering strategic roads, railways and RFIs) seeks to designate it by the end of 2014. It has been heavily criticised (not least by CPRE in [our consultation response](#)) so there may be significant revisions to it. Local plans should take account of designated transport NPSs (33).

6. CAMPAIGN ADVICE

6.1 Key themes for campaigning are:

- Consider how changes in the pattern of development and growth could reduce the need to travel, particularly by car. For example, making rural communities more self-contained or by increasing density around a railway station so as to increase the justification for a more frequent service.
- Consider what the ‘fullest possible use’ of public transport, walking and cycling could and should mean locally in terms of modal shares. Think about how this might be able to be changed during the period covered by the local plan, differentiating if needed between settlements and open country, or indeed particular developments.
- Consider the list of transport proposals, such as for new stations and any road-building. These are likely to have major impacts both on transport demand and land use patterns, so consider whether there are better alternatives, including smaller scale schemes. These may be set out in an LTP, local plan or Infrastructure Development Plans.
- Identify road hierarchies so that you have some criteria to judge the impacts of any additional traffic from new developments - this is key to ensure that development does not exceed environmental limits, such as the capacity of minor roads to carry motor traffic, reducing air pollution in Air Quality Management Areas or protecting areas of tranquillity from traffic noise.

- Engage with transport and land use planning at a neighbourhood level, particularly where a neighbourhood plan is being prepared. If you can make it easier to choose sustainable forms of travel for the first (or indeed last) mile of a journey, this can be key to changing travel patterns. For example, making it easy to walk or cycle to a station.

Overview

6.2 The difficulty of refusing planning permission on transport grounds, unless the residual impacts are severe, means that it will be even more important to influence local plans and neighbourhood plans by ensuring there are clear criteria, such as in relation to traffic flows. This is because if a development does not comply with an up to date local plan, then the presumption of sustainable development will not apply, and development proposals can be refused with less risk of the refusal being overturned at appeal. While LTPs are important - and these should in theory fit with local plans - if a development does not sit with the aspirations of an LTP, this will not carry the same weight in decision-taking as a failure to comply with a local plan.

6.3 You should consider addressing non-transport grounds when objecting to unsuitable development, for example in relation to climate change and design. Local and neighbourhood plans can include design codes that set out detail such as suitable layouts.

Modal shares

6.4 The UK is the most car dependent country in Europe after Lithuania, Iceland and Norway and the position is as bad in relation to freight depending on road transport. Only 6% of journeys are made by bus and coach - this is known as a 'modal share' - and, excluding London, the share is lower still. In terms of passenger travel, the UK has a relatively high modal share for rail - though again less good once the special case of London is included. As a result of the major investment being made in the rail network, capacity should double by the early 2030s.

6.5 With just 2% of UK journeys being made by cycle, compared to 12% in Germany (in rural areas 8%), 18% in Denmark and 27% in the Netherlands, there is also a huge potential to increase cycling. Munich has for example increased cycling's share from 6 % in 1996 to 17% of journeys in 2011, while Germany is aiming to increase rural cycling to 13% of journeys by 2020. German planning for 'towns of short trips' - in other words promoting dense, mixed use development to reduce the average length of journeys so that they are easier to cycle or walk - is key to this.

6.6 It is important therefore to plan for the 'fullest possible use' of walking, cycling and public transport in both plan-making and decision taking (17). So you should look carefully at transport assessments for new developments. Simply relying on a 'predict and provide' approach of extrapolating previous trends into the future is unsuited to this: the possibilities of new technologies such as electric bikes, car sharing and public transport smart cards are potential game changers. More detail about CPRE's preferred 'plan monitor and manage' approach and the problems with 'predict and provide' are set out in Campaign Briefing 3 on Housing.

6.7 Policies and development proposal should consider 'relative accessibility' by different means of transport so as to build in comparative advantages for sustainable modes over driving. This concept is included in Planning Policy Wales but not the briefer NPPF. What this means is that rather than simply checking to ensure a new development could be reached by bus or cycle, or engaging in promoting the use of public transport, the relative attractiveness of more sustainable travel choices should be improved. This may mean something simple like ensuring cycle parking and bus stops are closer to entrances than car parking or more complicated traffic management schemes.

6.8 For example, in the Dutch city of Groningen, where 60% of trips are cycled (the highest cycling modal share in Europe), through careful planning, such as the use of the principle of 'filtered permeability', the average crow flies distance that can be reached in 10 minutes is 2.4 km by bicycle compared with 1.6km by car. New residential development should be planned in this way to make walking and cycling the norm for shorter journeys, such as by maximising route choice for these modes while not allowing people to drive through.

Transport infrastructure

6.9 New transport infrastructure is likely to be a very significant influence on the location of new development as well as on modal shares. Besides checking your local plan and Local Transport Plan, see if there is an Infrastructure Development Plan, which sets out priorities for use of Community Infrastructure Levy (CIL) funding. You should also check Strategic Economic Plans, produced by Local Enterprise Partnerships, for transport proposals. These may well draw upon other sources of funding such as CIL and New Homes Bonus. Make sure these different plans, which are drawn up by separately from local development plans and LTPs, are joined up.

6.10 Where a settlement or business park is increased in size, car trip rates should not simply be extrapolated to justify road-building. The increase may mean that new bus services or cycle route infrastructure will become viable. Some authorities take a 'trip credit' approach, where developers offset new trips from their development by providing better walking, cycling and public transport facilities for existing journeys, so as to aim for no net change in motor traffic levels. New and wider roads tend to generate increased motor traffic, so should be the last resort. If they can be justified on this basis, ensure that there are demand management measures to lock the benefits of the additional capacity, such as bus or cycle lanes and traffic calming, for example of streets that have been bypassed.

6.11 The NPPF highlights the need to protect options that could be critical to widen transport choice, such as reopening railway lines and wharves, as well as providing new routes for walking and cycling (41). Make sure that local plans protect such opportunities.

Road hierarchies

6.12 Some local plans refer to functional road hierarchies, which, where they exist, are usually set out in LTPs. Traditionally the relevance of these in planning has been to restrict frontage access on higher tier roads. This is because of the safety risk of drivers turning off or onto busy roads with fast-moving traffic. There is also a need to protect the character of lower tier roads, such as residential streets and country lanes, from increasing flows of motor traffic. Lower tier roads are crucial for walking, cycling and, in rural areas, activities such as horse riding.

6.13 In some cases, higher tier roads may be a 'mixed priority route', for example where a main road passes through a town or village centre so that there are place functions (shopping, social activities) as well as a movement function. While guard rails may have been used in the past on the basis of segregating pedestrians from vehicles on safety grounds, best practice now seeks a better balance of these functions, such as by 20 mph speed limits and de-cluttering.

6.14 You may wish to encourage the designation of certain roads as particularly sensitive, so as to make it harder for new developments to lead to negative traffic impacts on them. This could be through policies relating to minor roads that are in designated landscapes or which are useful routes for walking and cycling.

6.15 There is special guidance on the impact of development on Highways Agency roads - motorways and trunk roads, known as the strategic road network. This is contained in [DfT Circular 2/2013 Strategic road network and the delivery of sustainable development](#). The

Infrastructure Bill, which could become law by early 2015, proposes to replace the Highways Agency with a strategic roads company. This would lead to further changes in processes.

Neighbourhood planning

6.16 There has been limited consideration of the integration of transport and planning at the neighbourhood level. CPRE's transport toolkit - see below for link - hopes to change this. Even if there is no road hierarchy in a local (transport) plan, you could seek to include these in neighbourhood plans. Similarly neighbourhood plans could include neighbourhood development orders to make it easier to install cycle lockers and design codes to increase walking and cycling, while reducing clutter.

6.17 Where neighbourhood plans are in place, neighbourhood forums (usually parish councils in rural areas) will receive 25% of CIL, some of which could be used for transport measures. For example, developments below a certain size do not require travel plans - packages of measures to promote sustainable travel. But the cumulative impact of smaller developments can be significant. One way round this could be to encourage smaller developments to contribute to neighbourhood level travel planning.

Further campaigning advice

6.18 A range of resources to help you plan an effective campaign, communicate your message, and gather people to your cause can be found on Planning Help:

www.planninghelp.org.uk/improve-where-you-live/campaign-tips

7. FURTHER INFORMATION

CPRE Resources:

www.planninghelp.org.uk

www.transporttoolkit.org.uk

Other Useful Information:

(i) Relevant CPRE research and guidance publications, available from www.cpre.org.uk

CPRE Transport Policy Guidance Note (2011)

www.cpre.org.uk/resources/transport/transport-policy/item/1743-policy-guidance-notes-transport

CPRE Transport Policy Guidance Note - principles (2011)

www.cpre.org.uk/resources/transport/transport-policy/item/1742-policy-guidance-notes-transport-principles

CPRE Meeting the Growth Challenge - the Smart Growth Approach (2013)

www.cpre.org.uk/resources/housing-and-planning/planning/item/download/2872

(ii) Relevant information on other websites

Cutting carbon, creating growth: making sustainable local transport happen - White Paper. Department for Transport, 2011

www.gov.uk/government/publications/creating-growth-cutting-carbon-making-sustainable-local-transport-happen

Manual for Streets. Department for Transport & CLG, 2007
www.gov.uk/government/publications/manual-for-streets

Planning for sustainable travel. Chartered Institute of Highways & Transport
www.plan4sustainabletravel.org/

Thriving Cities: Integrated land use and transport planning. Transport for Quality of Life, carried out for PTEG. 2011
www.transportforqualityoflife.com/policyresearch/planningforsustainabletransport/

Master planning Checklist for Sustainable Transport in New Developments. Transport for Quality of Life, carried out for the Campaign for Better Transport, 2008
www.transportforqualityoflife.com/policyresearch/planningforsustainabletransport/