

The background image is a photograph of a modern residential development. It features several multi-story buildings with vertical wooden cladding. The buildings are interspersed with lush green trees and bushes. A paved path with a wavy pattern leads through the greenery. The sky is bright with some clouds.

MHCLG Planning for the Future White Paper

*Consultation Response:
A Transport Perspective*



CITY SCIENCE
endless possibilities

CONTEXT

This paper provides City Science's transportation consultation response to the Ministry of Health, Communities & Local Governance (MHCLG) White Paper '*Planning for the Future*'. '*Planning for the Future*' was published by MHCLG in August 2020 and seeks to obtain views on a proposed package of proposals of planning system reforms in England.

As a private sector organisation who works extensively with local planning authorities to prepare sustainable transport and wider infrastructure evidence bases to support the preparation of development plans, we are well placed to provide first-hand insight into the consultation process. Our response has been informed by a collation of our internal diverse views and experiences in application of the current system.

CURRENT PLANNING SYSTEM AND CASE FOR CHANGE

The White Paper has been produced to address the existing perceived shortcomings of the existing planning process. The current planning process is directed by a national framework underpinned by key legalisation such as the Town and County Planning Act (1990), the Planning Act (2008) and the Localism Act (2011) alongside national planning policies.

Key national documents constituting Government policy and guidance are the National Planning Policy Framework (NPPF) and the Planning Policy Guidance (PPG). These documents must be considered when local development plans are prepared and NPPF also forms a material consideration in the determination of planning applications.

Local planning authorities (such as local authorities) currently provide two key functions in the planning process:

1. **Plan-Making:** including the production of Local Plans and Joint Core Strategies which identify geo-spatial development allocations alongside locally specific development policies (e.g. sustainable transport) that planning applications must conform with.
2. **Development Management and Control:** The assessment and determination of planning applications including identifying planning conditions and negotiation of Section 106 Agreements, developer contributions, calculation of Community Infrastructure Levy (e.g. to fund transport infrastructure)

MHCLG identify in the White Paper that the case for change in the current system is:

- Too complex
- Based on discretionary rather than rules
- Lengthy Local Plan adoption time
- Assessment of housing need, viability and environmental impact 'too complex and opaque'
- Lost public trust and engagement in the planning process
- Based on outdated technology i.e. only document based
- Little incentive for high quality homes / places
- Not enough homes built to meet housing targets
- Improve outcomes on design and sustainability

PLANNING FOR THE FUTURE WHITE PAPER

The [White Paper](#) has several key aims to enhance the planning process through:

- Streamlining and modernising the planning process
- Improve outcomes on design and sustainability
- Reform developer contributions.
- Ensure more land is available for development growth where it is needed (approximately 300,000 new homes delivered annually)



Figure 1: Planning for the Future White Paper

There are three 'pillars' identified in the White Paper to enhance the planning process; each of which contain various proposals. These are:

1. **Planning for Development**
2. **Planning for Beautiful and Sustainable Places**
3. **Planning for Infrastructure and Connected Places**

Our consultation response is structured around each of these pillars in turn with respect to proposals which impact transport and sustainability. Specific consultation questions identified in the White Paper are cross-referenced to ease readability.



Figure 2: The government target is for the delivery of 300,000 new homes across England every year¹

¹ <https://www.geograph.org.uk/photo/3478289>

PILLAR ONE - PLANNING FOR DEVELOPMENT PROPOSALS

TOP THREE PRIORITIES FOR PLANNING

(RESPONSE TO CONSULTATION QUESTION 4)

The top three priorities for a new planning system should be:

- 1. Climate Change Action** - We are facing a climate emergency and it is fundamental that the most pressing priority in the planning system overhaul must be to support the UK government's legal obligation to achieve net zero by 2050. Achieving net zero is going to require fundamental and bold systematic action both in retrofitting existing communities as well as achieving it in all forthcoming developments yet to be built across transport and energy. As such, if we are serious about meeting this obligation, we need to refocus the system to obligate that all forthcoming developments lock this in by achieving net zero carbon from the outset as a core principle of a future planning system.

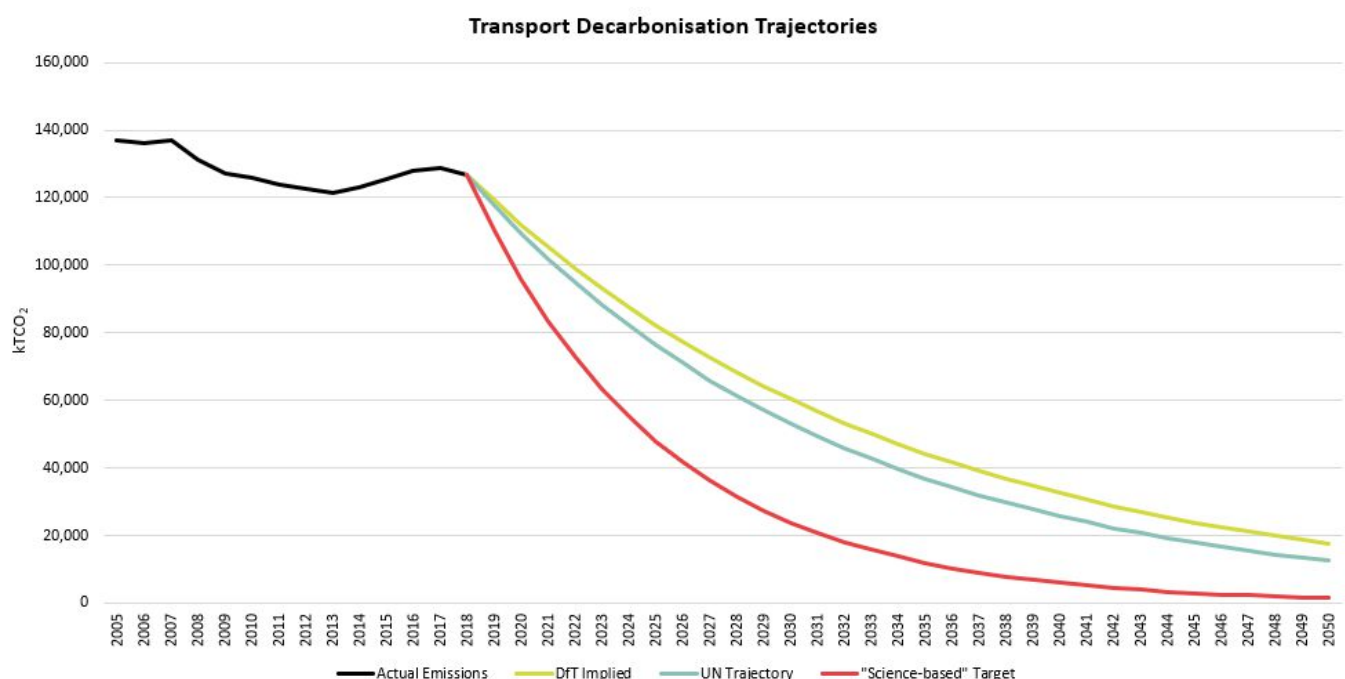


Figure 3: Rapid trajectory of transport decarbonisation required

- 2. Improve Quality of Life** – The planning system has significant potential to positively enhance the quality of life not only for existing residents but prospective residents moving into new communities. This ethos should form a core requirement of a new planning system by taking a holistic consideration of factors such as localism and the 15 minute city concept, access to local facilities and green space and ensuring that communities truly prioritise healthy lifestyles through active travel rather than the need for car dependence.
- 3. A Local People Centred Approach** – As MHCLG acknowledge in the White Paper, the current planning system has lost the trust of local people due to high levels of dissatisfaction and disengagement with the process. Local decision makers are experts at understanding the intricacies of community ecosystems and are best placed to devise solutions to key challenges such as achieving decarbonisation in transport by consideration of access to local facilities, how to successfully integrate homes and local jobs as well as creating high quality distinctive places.

ALTERED LOCAL PLAN-MAKING PROPOSALS

(RESPONSE TO CONSULTATION QUESTIONS 5, 6, 7 & 11)

Simplified Zonal Land Use Designations and Automatic Permissions (Proposal 1 and Proposal 5)

There are benefits in the simplification of the land designation process in Local Plans into three categories:

1. Growth Areas
2. Renewal Areas
3. Protected Areas

Fundamentally, this would ease the understanding of the planning process and therefore **increase the opportunity for local people to become more engaged in the decision-making process**. Despite this, there are several risks with implementing a 'one size fits all' approach to the designating of land – how, for example, do you ensure that new developments result in higher quality places and are able to facilitate localism first principles? **Moreover, how do you ensure that Growth Areas awarded automatic permission in principle have given due consideration to the sustainable transportation and access implications** without being subject to the current rigour of the Local Plan and planning application process through a Transport Assessment?

National Development Management Approach (Proposal 2)

The principle of entirely removing the development management policies from Local Plans in favour of an exclusively 'top down' National Development Management Policy approach cannot be supported. **This will exacerbate the existing mistrust of the planning system that the White Paper aims to address by giving local authorities and local people a very limited voice** in how development should be delivered in their communities. Communities are unique and local experts should be empowered to develop evidence-based plans which consider the local intricacies and needs of communities across decarbonisation and infrastructure.

'Sustainable Development' Local Plan Test (Proposal 3)

The principle of replacing existing legal and policy tests for Local Plan with a consolidated test of 'sustainable development' is to be welcomed, however, this is dependent on the finessing of the detail behind its quantification. **Any sustainable development test should place zero carbon at its heart to ensure that due consideration has been given within the Local Plan to substantiate how allocations are able to meet the net zero requirement by 2050** across key areas such as transport, energy and waste rather than relying on environmental impact assessment criteria (See response to Pillar 2).

New Interactive, Web-Based Map Standard for Planning Documents (Proposal 7)

The shift towards encouraging greater use of digital platforms and mapping is a positive step in the right direction to **increase engagement with local people in the planning process and to make people aware of what, where and why development is planned**. We would strongly encourage the standard templates be developed that are open-source and made freely available online to use in third party applications. This would significantly enhance the transparency of the planning process.

OUR PRIORITIES FOR SUSTAINABILITY IN THE PLANNING PROCESS

(Response to Consultation Question 16)

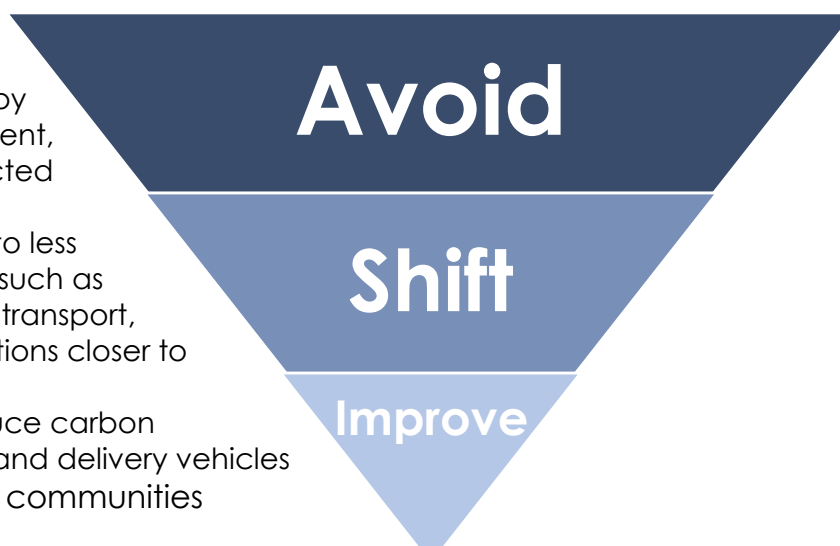
The current planning process is characterised by an inherent disconnect between the delivery of new housing growth and the legislative requirement to achieve net zero by 2050. **This carte blanche priority assigned to the delivery of more 300,000 new homes a year, all of which will currently emit additional carbon, will exacerbate the Climate Emergency and placing the net zero requirement even further out of reach** using the existing system.

The merits of focusing on other wider environmental sustainability priorities, such as preserving green space or Areas of Outstanding Natural Beauty, will only be successful in the short term if we lose sight of the longer-term decarbonisation requirement. The overarching sustainability priority for the planning process therefore needs to **place carbon at the core** rather than as an afterthought. If global temperatures rises above pre-industrial levels cannot be limited to 1.5c or even 2c, then our **rich environmental assets across England are likely to be degraded through climate change impacts as a result of sea level rises or the entire collapse of our natural ecosystems regardless.**

A key priority should therefore be to embed carbon accountability within the planning process, such that all new developments are required to achieve net zero carbon from the outset.

From a transport point of view, the planning process plays a pivotal role in being able to successfully **reduce the carbon impact from private cars and delivery vehicles** in future developments, which make up the majority of domestic transport emissions; particularly in being able to positively influence a reduction in travel demand and distances. Through our robust evidence base gathered through ongoing work examining carbon emissions from UK settlement typologies with the RTPI, we advocate a three-tier approach to achieving zero carbon from transport in the planning process:

1. **Avoid** travelling through reducing travel demand by developing self-sufficient, vibrant and digitally connected new communities
2. **Shift** from car dependency to less carbon intensive modes for such as walking, cycling and public transport, enabled by making destinations closer to travel to.
3. **Improve** technology to reduce carbon emissions impact from cars and delivery vehicles for longer journeys in new communities



A reduction in travel demand and vehicular kilometres travelled requires a fundamental rethink in how we develop allocation sites both through the future planning system and in an overhaul of NPPF (Proposal 15) towards a model that encourages far greater multi-disciplinary collaboration; between transport planners and land use planners, economists, environmental planners and digital connectivity specialists.

This is underpinned by the fundamental principle that transport is a derived demand which means that people travel to access goods, services and employment rather than for the pleasure of travelling itself. If we can view the planning process through this new localism lens, we can unlock opportunities to bring destinations that people want to visit closer to

OUR PRIORITIES FOR SUSTAINABILITY IN THE PLANNING PROCESS

(Response to Consultation Question 16)

where they live rather than create isolated communities that lock in car dependency. In effect, this means creating neighbourhoods that are largely self-sufficient.

This new approach to how we plan communities could be centred around international precedence informed by the Parisian 15-minute city or Melbourne 20-minute neighbourhoods which have been successful in the creation of sustainable, healthy and self-contained places. As a minimum, destinations such as schools, retail and leisure should all be cited within a minimum distance of residential land uses as well as made economically viable through careful consideration of housing density.



Figure 4: Melbourne 20-minute neighbourhoods²

There is also a tremendous opportunity presented by the COVID-19 pandemic where millions of the UK workforce have evidently removed their daily commute as a result of home working. This clearly has a significant carbon reduction future potential and therefore a new planning system alongside NPPF needs to address how **digital connectivity can be harnessed to suppress travel demand**. This could include, for example, establishing minimum digital infrastructure requirements across both superfast broadband and 5G coverage, ensuring minimum flexible working space requirements in new residential communities or ensuring suitable local employment opportunities.

² <https://www.planmelbourne.vic.gov.au/current-projects/20-minute-neighbourhoods>

OUR PRIORITIES FOR SUSTAINABILITY IN THE PLANNING PROCESS

(Response to Consultation Question 16)



Figure 5: New Localism - bringing destinations that people want to visit closer to where they live is key to suppressing travel distances³

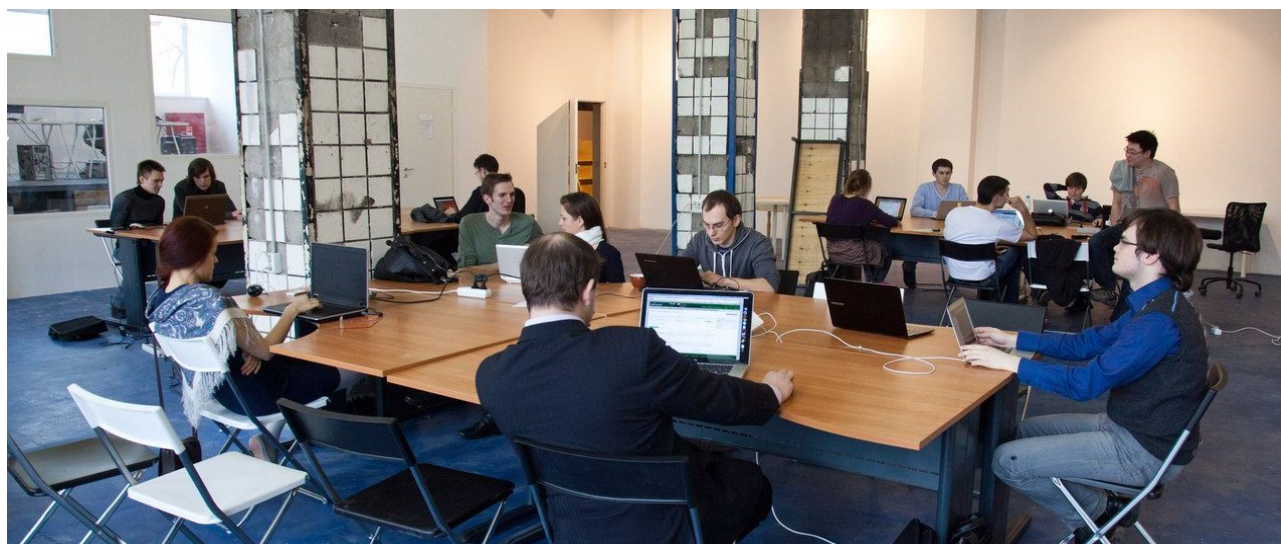


Figure 6: Flexible working and digital connectivity can play a key role in reducing peak commuting travel demand⁴

LOCAL DESIGN GUIDES AND LOCAL CHAMPIONS

(Response to Consultation Questions 17 and 18)

Too often street designs in residential communities continue to rely on outdated road standards which can lock in car priority. We therefore welcome the use of local design guides and accompanying establishment of a body to support design coding to create more potential for the creation of streetscapes that actively encourage walking and cycling shift. If appropriately empowered, local authority street design champions will devise locally tailored solutions which can promote modal shift.

Despite this, the use of design guides cannot be a substitute for good quality cross-discipline site design which can achieve net zero carbon. Aspects such as ensuring residential communities have the right diverse land use mix and embed the key principles of new localism are key if we can successfully reduce transport related carbon emissions (see answer to Question 16).

³ <https://www.geograph.org.uk/photo/3100373>

⁴ <https://commons.wikimedia.org/wiki/File:Zonaspace-coworking-openspace.jpg>

PRIORITIES FOR NEW INFRASTRUCTURE

(Response to Consultation Questions 21)

Local authority funding sources to deliver new transport infrastructure is currently largely reliant on vehicle-based charges such as from parking and penalty charge notices alongside individual funding grants from National Government departments and agencies. The delivery of a consolidated transport infrastructure fund through a new planning system offers a greater potential to diversify from reliance on vehicle-based revenue and provide a comprehensive and flexible funding source targeted at delivering new large infrastructure schemes to encourage low carbon modes such as strategic active travel or public transport schemes.



Figure 7: Funding raised through the planning system can deliver new transport schemes for zero carbon modes such as active travel for shorter distance journeys⁵



Figure 8: Funding raised through the planning system can deliver new bus priority schemes to induce modal shift for longer distance journeys⁶

⁵ <https://www.geograph.org.uk/photo/6124635>
⁶ <https://www.geograph.ie/photo/3461343>

CONSOLIDATED INFRASTRUCTURE LEVY

(Response to Consultation Questions 22 and 25)

In theory, the consolidation of the current Section 106 obligations and the CIF into a new Infrastructure Levy provides greater flexibility to local authorities in delivering new transport infrastructure funding across the authority's region. However, **there remains significant shortcomings within the proposals in relation to the certainty and suitability of funding.**

Whilst they can be protracted, current Section 106 obligations have an advantage in providing targeted and specific new transport infrastructure at various stages of the development process; prior to construction, prior to occupation and at various milestone occupations years throughout. **Removing this entirely and transferring the funding to be levied only at the occupation stage of the development process transfers significant risk from developers to local authorities in the delivery of transport infrastructure.** This would make it essential that local authorities were able to borrow against the anticipated revenue to ensure that sufficient transport infrastructure was in place prior to occupation and during the build out of sites.

The necessity to borrow infrastructure levy funding up front presents a significant risk to local authorities. This is due to several factors of uncertainty:

- There is **no certainty that the full quantum of a development on a site will ever be completed** which would require local authorities to pay back borrowed infrastructure funding.
- The **timescales of the site construction process may take longer** than anticipated.
- There is likely to be a **significant time lapse between the point when planning consent is granted (and the infrastructure levy is calculated) and the site becoming fully occupied.** In a buoyant housing market, it would be advantageous for developers to wait for house prices to increase as much as possible before commencing and completing construction on a site to increase the return margins on infrastructure levy funding charged originally.

An additional risk to local authorities is that the **internal funding divide of infrastructure levy proceeds remains subject to a comprehensive and accurate assessment of the differing infrastructure needs** across areas such as transport, education, healthcare, environmental management and utilities arising from a development site. From a transport point of view, the current process requires the production of a Transport Assessment to substantiate localised and specific transport infrastructure requirements within Section 106 obligations and there is a risk this may not be undertaken in the same detail using the infrastructure levy approach. Further measures such as ringfencing certain infrastructure funding proportions should therefore be agreed by all parties at an early stage in the process.

Section 106 Agreements currently provide transport related funding for other elements other than transport infrastructure. This, for example, could include softer measures such as subsidising bus services for a limited period or longer term maintenance. **The infrastructure levy does not specifically target this and there should be a mechanism for operational funding elements to be captured within the planning process.**

It is **essential that infrastructure levies rates are set locally rather than using a blanket national approach** to reflect the differing transport infrastructure needs and delivery costs across local authorities. This is key to ensure that localised decision making remains central to the planning process as well as provide accountability in what the infrastructure funding is spent on within the authority.



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