

The Chartered Institution for Highways and Transportation's response to the 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system' consultation

The Chartered Institution of Highways and Transportation (CIHT) welcomes the opportunity to respond to the consultation on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system.' We appreciate that the government has made reforming the planning system an urgent priority and has committed to extensive planning reform. In the CIHT's manifesto, [A Transport Network Fit for All Our Futures](#), we are clear that real change is needed in the planning system to enshrine the principles of integrated land use and transport planning. Planning rules should encourage place-based solutions that create attractive built environments and lessen the need to travel. Planning should also support and promote the availability of local services and provide people with real choices and appropriate alternatives to private car use. Closer integration of transport and planning is needed to ensure that housing development meets the needs of people, not cars.

Transport is essential to the government's strategic priorities of strengthening the economy, improving public health outcomes and accelerating net zero. The recently published 'Rail and Urban Transport Review' recommended the publication of an integrated transport strategy for England, citing '*the fact that transport is a key enabler of industrial growth and productivity.*'¹ Poorly located development locks residents into long and expensive journeys, with limited access to services and poor connectivity in the labour market. There is clearly a need for new homes, but these developments must be serviced by sustainable transport networks, including walking, wheeling, cycling and public transport, if house building is going to unlock economic growth.

We believe that some of these proposals represent a positive step. The emphasis on a 'vision-led' approach is welcomed by CIHT. We have previously been critical of the outdated 'predict and provide' approach prevalent in planning, which reinforces car-centric development. We support a more strategic approach to economic and plan making by strengthening cross-boundary collaboration. However, we are concerned that, without further amendments, elements of these proposals will reinforce unsustainable development patterns. We would therefore like to emphasise the following points:

- **Sustainability:** While much emphasis has been placed on the *quantity* of houses built, more emphasis is needed on ensuring *quality*, sustainable development. The NPPF should be clearer on what it means by sustainable development, with a stronger emphasis on sustainable transport.
- **Clarity:** We believe stronger clarification is needed around grey belt development. Particularly ensuring that 'grey belt' land taken from the green belt has adequate provision for, and potential to improve, sustainable transport accessibility. The golden rules must be robust enough to ensure

¹ Arup, Urban Transport Group (2024), [The Rail and Urban Transport Review](#), Arup

grey belt developments are not arbitrarily designated, but rather appropriately serviced by sustainable transport.

- **Urgency:** Without immediate and further updates to the NPPF, we are concerned that the speed and scale that the government is seeking to boost housebuilding will worsen planning outcomes and exacerbate poorly located development patterns.

CIHT offers its ongoing support to the government in the planning reform process. It is important that the opportunity presented by this update to the NPPF is fully utilised to ensure the planning system functions to support sustainable development that promotes economic growth, public value and greener development. CIHT encourages the government to continue to engage with stakeholders throughout this process and would be happy to facilitate cross-sector discussions to assist with this.

Consultation Questions

Q1: No comment

Q2: No comment

Q3: No comment

Q4: No comment

Q5: No comment

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

While we appreciate that the government has made increased house building a key strategic priority, *quantity* must not come at the expense of *quality*. Paragraph 10 specifies that the presumption ensures that sustainable development is pursued in a positive way. The NPPF needs to support the right type of development in the right places. However, the changes to paragraph 11 d), which this consultation claims will *'tilt the balance towards approval'* and bring *'land into scope of potential development where it has not been specifically allocated for development'*, risks promoting low quality, unsustainable development. Development needs to be socially and environmentally appropriate, not just arbitrarily designated.

We are also concerned that the proposed amendments do not place sufficient weight on access to sustainable transport in decision making. Amendments to paragraph 11 d) ii. refer to conflicts with policies set out in chapters 9 and 12 as reasons not to grant permission. However, these chapters do not provide local authorities sufficient scope to refuse unsustainable, car-led development (see also our answer to Question 69). In general, the NPPF should be clearer in ensuring that new and existing development is located and designed to ensure that there is an effective choice of assessing sustainable transport services.

The NPPF refers to sustainable development throughout but does not provide enough clarity on what 'sustainability' means in practice. Generally, sustainable development refers to 'development that meets the needs of the present without

compromising the ability of future generations to meet their own needs.² Within a planning context, we believe that meeting the needs of the present without compromising the ability of future generations to meet their own needs should mean providing people with appropriate alternatives to private car use. We strongly suggest that Chapter 2 of the NPPF should align more closely with the principles of sustainable development within a planning context as outlined in DfT Circular 01/22, explicitly stating that *'new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.'*³

Sustainable transport requirements should be integral to the planning process. The NPPF provides limited guidance on the weight that should be given to sustainable transport provision in the decision-making process. There is a danger that without wider changes to the NPPF, enhancing its overall clarity on sustainable development and its importance in decision making, that bringing more local authorities under the scope of the presumption as described will accelerate unsustainable development patterns.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

We understand the need to increase land supply for housing development. However, safeguards should be in place to ensure that the land supply is suitable for appropriate development with adequate provision for sustainable transport and local services.

We would suggest that requiring provision for sustainable transport and local services should be given the same weight as requirements to demonstrate 5 years of specific, deliverable sites for decision making purposes.

We suggest this addition, shown in bold below, to paragraph 70 (previously paragraph 69):

69-70. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and***
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan-period.***

² As defined by the [International Institute for Sustainable Development](#)

³ DfT (2022), [Strategic road network and the delivery of sustainable development](#), Department for Transport

c) Ensure that sites identified can be sustainably accessed, by walking, wheeling, cycling, and public transport.⁴

Q8: No comment

Q9: No comment

Q10: No comment

Q11: No comment

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

We agree that the NPPF should support effective cooperation on cross boundary and strategic planning matters. Transport is a key spatial issue that requires strategic planning. Collaboration can also be advantageous in that it can support the exchange of skills and resources. However, the current arrangements allowing for cross-boundary collaboration have not always resulted in desired outcomes. We have previously called for more effective mechanisms to facilitate coordination across relevant local authorities and other key bodies.⁵

We agree with amendments to further support effective co-operation on cross boundary and strategic planning matters. We welcome the proposed paragraph 27, which supports effective cooperation. However, we would caution that the proposed amendments to paragraph 28 (previously paragraph 27) may undermine this. Paragraph 28 suggests that '*strategic policy-making authorities and inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.*' There is a danger that the proposals leave too much scope for collaboration to be dismissed in the interest of expedient decision making.

Collaboration should not be viewed as a constraint on strategic decision making. Planning is unlikely to be truly 'vision-led' without engagement with a wide-range of stakeholders. This will require better processes and mechanisms to ensure collaboration and joint working functions efficiently. The NPPF should stress the importance of collaboration at the earliest stage of plan making to encourage a more aligned and evidence-based approach.

Relevant transport authorities (such as Subnational Transport Bodies (STBs)) should also be consulted at the earliest stage of plan development. This will allow planning to account for trips associated with potential sites, as well as any opportunities to extend public transport availability. We also suggest that local bus operators and/or Bus Enhanced Partnership Chairs should be made statutory consultees for new

⁴ LA PowerPoint

⁵ CIHT (2019), [Better Planning, Better Transport, Better Places](#), Chartered Institution of Highways and Transportation

developments, which will support connectivity with existing bus networks through route extensions or enhancements.⁶

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

We support amending the tests of soundness. We believe that plans are ‘sound’ when they provide a clear strategic vision that includes ambitious transport planning, appropriate connectivity, spatial consistency, collaboration and delivery.

We suggest including a sustainable transport assessment as part of the “soundness of the plan”. Clear evidence of collaboration in plan making should also be considered an important measure of soundness. The NPPF should strike a balance between supporting timely decision-making and ensuring reliable delivery. Major developments can take time, which leaves them open to uncertainty, such as economic stability, extreme weather, inflation and long-term funding availability. A plan is sound if it has a strong contingency plan. Plans should be outcome focused and have alternative routes for delivery, considering in advance different scenarios which may impact or alter the course of delivery.

To support sound, ‘vision-led’ plan making, we suggest reconfiguring Paragraph 36 c) (previously paragraph 35 c)) to strengthen the need for collaboration and introduce a Paragraph 36 e) requiring considerations of contingent factors that may impact development within local plans and spatial development strategies.

Question 14: Do you have any other suggestions relating to the proposals in this chapter?

There is a need for updated and integrated guidance around plan making. Updated Transport Appraisal Guidance and Local Transport Planning Guidance must be provided and should be signposted in the NPPF to ensure consistency and that principles are enshrined as policy.

Local Transport Plans are a statutory requirement but are poorly integrated into the NPPF. We suggest that Subnational Transport Body Strategic Transport Plans and Local Transport Plans should be explicitly referenced in chapter 9 of the NPPF. Vision-led transport planning should encourage the integration of STB strategic planning into Local Transport Plans which are integrated into plan making as a key evidence base and incorporate accessibility and carbon assessment methodologies into the evaluation of the location of development requirements of the NPPF and local plan.

Q15: No comment

Q16: No comment

Q17: No comment

⁶ Campaign for Better Transport

Q18: No comment

Q19: No comment

Q20: No comment

Q21: No comment

Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Given the significant weighting Previously Developed Land (PDL) has in the proposed definition of grey belt (see answer to Question 23) and the priority given to PDL in proposed sequential test approach (see answer to Question 28), we would suggest there is a need to update the definition of PDL.

Currently, PDL is defined in the NPPF as

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

To help ensure land is released in the right places, we would suggest PDL should be defined as

'land which is or was occupied by a permanent structure that has adequate accessibility to sustainable transport networks and infrastructure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

The proposed amendment to paragraph 144 (previously paragraph 147), giving priority to PDL in 'sustainable locations' could be strengthened by being incorporated into the definition of PDL, provided that more clarity is given as to what is meant by 'sustainable locations' (As indicated in our answer to question 28).

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

We believe that sustainability is not appropriately incorporated into the definition of grey belt. Currently the core elements of the definition are:

- Land in the Green Belt comprising PDL
- Any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes
- Excluding those areas or assets of particular importance listed in footnote 7 of this Framework

Neither the NPPF's definition of (PDL), or the five green belt purposes make any reference to sustainable transport or sustainable development. We believe that the current definition, which defines the grey belt against these two factors, may not appropriately safeguard sustainable grey belt development.

We suggest the definition needs to directly reference sustainability objectives and expectations around effective use of land and transport access.

Q24: No comment

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

We welcome the development of additional guidance. We emphasise that guidance is strengthened by direct reference in the NPPF.

Q26: No comment

Q27: No comment

Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

We agree that some of the provisions in these proposals have the potential to improve development patterns; but, as outlined in this response, we are concerned that without further amendments some proposals will increase the risk of development in the wrong places.

The proposed plans for a sequential test that gives first consideration to PDL within the green belt may not support land release in the right places without adequate safeguards to ensure the availability of sustainable transport. Given that grey belt land is likely to be on the periphery of existing settlements, there is still a risk that grey belt developments will be car-dependent, increasing the need to travel. Under the current definition, PDL may include inappropriate land that has poor connectivity

and accessibility to local services. We believe that first consideration should be given to PDL that has appropriate sustainable transport linkages.

We support the proposed amendments to Paragraph 144 (previously paragraph 147), which clarify that:

'plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations.'

However, we emphasise the need for a clear definition of 'sustainable locations' in the NPPF. In some areas, necessary investment in sustainable travel options may make development unviable, leading to car-dependent developments. We emphasise that the NPPF must be clear and without ambiguity.

We would encourage Paragraph 144 to clearly state that first consideration should be given to PDL in locations with appropriate access to sustainable transport networks and infrastructure.

Q29: No comment

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

As with our answer to Question 28, we emphasise that greater clarity is needed in what is meant by "sustainable 'grey belt' land". Decision-led development on greenbelt should be supported by unambiguous policy to safeguard sustainable development.

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Q32: No comment

Q33: No comment

Q34: No comment

Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

We support the delivery of affordable housing. However, we emphasise the importance of ensuring equal access to sustainable housing and services. Transport and inequality are linked because affordable transport provides access to opportunities including education, training and employment, social networks, housing, recreation, communities' engagement and key goods and services.⁷

⁷ DfT, NatCen (2019), [Transport and Inequality](#), Department for Transport

Creating affordable homes in hard-to-reach areas will not support economic stability and connectivity, and instead risks widening inequalities.

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

We support the delivery of good quality green spaces and nature in placemaking, and we welcome this inclusion to the golden rules.

CIHT has previously conducted research on Green and Blue Infrastructure (GBI). GBI brings many social, environmental and economic benefits to a local area. However, we have found that it is often under-utilised, particularly in streets and roads, and that knowledge gaps are slowing planning and implementation progress. We suggest that a lack of guidance is partly why local authorities (including the planning, development, highways operations, and maintenance functions) struggle to fully engage in the GBI process.⁸ CIHT would welcome the introduction of guidance that supports the development of GBI in public spaces.

Q37: No comment

Q38: No comment

Q39: No comment

Q40: No comment

Q41: No comment

Q42: No comment

Q43: No comment

Q44: No comment

Q45: No comment

Q46: No comment

Q47: No comment

Q48: No comment

Q49: No comment

Q50: No comment

Q51: No comment

Q52: No comment

Q53: No comment

⁸ CIHT (2023), [Green and blue infrastructure: A transport sector perspective](#), The Chartered Institution of Highways and Transportation

Q54: No comment

Q55: No comment

Q56: No comment

Q57: No comment

Q58: No comment **Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?**

Our own research indicates that encouraging beauty in placemaking may lead to important nature-based solutions such as GBI being viewed as a ‘decorative add on.’⁹ When additional references to beauty were consulted on in 2023, we cautioned that this may detract from the important functionality of GBI, particularly in delivering biodiversity, decarbonisation, sustainability and economic targets.¹⁰

We agree with retaining references to well-designed buildings and places. While an attractive built environment is an important part of placemaking, so too is functionality. This means giving people access to services and facilities using sustainable transport, such as active travel and public transport.

Q60: No comment

Q61: No comment

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

We welcome the changes proposed to paragraph 84 b) and 85 (previously paragraphs 86 b) and 87) of the NPPF. Freight and logistics considerations should be better integrated in the planning process. Through our work in stakeholder engagement, we have found that there is significant appetite in both the public and private sector to develop more sustainable local freight and logistics practices. We have identified local authorities as having a key role to play, particularly in last mile logistics. We would encourage the government to develop updated guidance to better assist local authorities in freight and logistics planning. CIHT offers its support and would be delighted to assist in the development of any guidance on freight and logistics.

There is a need for guiding principles to be established around how freight and logistics considerations can be incorporated into planning and decision making. This includes parking accessibility for local businesses, arrangements for consolidation and other forms of infrastructure to support sustainable last mile practices. Local authorities can use their estate to support more sustainable last mile practices, and

⁹ CIHT (2023), [Green and blue infrastructure: A transport sector perspective](#), The Chartered Institution of Highways and Transportation

¹⁰ CIHT (2023), [Response to the Levelling Up and Regeneration Bill: reforms to national planning policy](#), Chartered Institution of Highways and Transportation

this should be a consideration when assessing supply of deliverable sites for decision making purposes.

We suggest strengthening the requirement for local authorities to develop freight strategies as part of Local Transport Plans. This should be accompanied by guidance which emphasises the importance of collaboration with local business owners, suppliers, logistics companies and other key stakeholders. We would also suggest that the development of a national transport strategy should include a framework for freight and logistics management.

Question 63: Are there other sectors you think need particular support via these changes? What are they and why?

Chapter 6. of the NPPF focusses on Building a strong competitive economy. We would like to emphasise the role played by public transport and active travel infrastructure in supporting this objective by strengthening labour market connectivity and encouraging active lifestyles.

Access to public transport and active travel infrastructure are necessary to the UK's strategic growth objectives. Peak hour passenger journeys are expected to grow significantly by 2055, which public transport will need to accommodate, or risk constraining employment growth.¹¹ Physical inactivity is contributing to levels of obesity, which is projected to cost the NHS £9.7bn a year by 2050, with wider costs to society estimated to reach £49.9bn.¹² Planning needs to reflect the critical role that public transport and active travel will need to play in supporting growth.

We believe Chapter 6 can be strengthened to reflect the critical role played by active travel and public transport in the UK's economic development. For example, we suggest that paragraph 85 b) (previously paragraph 87 b)) should make explicit reference to active travel infrastructure, given its role in supporting sustainable last mile delivery modes, such as cargo bikes and creating connections in urban and rural areas through the National Cycle Network.

Better bus provision will be necessary in ensuring that there is opportunity for stronger connectivity to be established around new developments in rural areas and locations not currently well served by public transport. The current government has announced plans to make it easier for local authorities to begin franchising of bus operations. Franchised operations would be a lot easier to implement if bus depots are part of the franchise agreement. We therefore also suggest including bus depots in the amendment to paragraph 84 b) (Previously paragraph 86 b)).

Q64: No comment

Q65: No comment

Q66: No comment

¹¹ National Infrastructure Commission (2023), [The Second National Infrastructure Assessment](#), National Infrastructure Commission

¹² Public Health England (2017), [Health matters: Obesity and the food environment](#), Public Health England

Q67: No comment

Q68: No comment

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

We agree with the changes to paragraph 112 (previously paragraph 114), which mirror past recommendations made by CIHT. We have been consistently critical of the prevalent ‘predict and provide’ approach to planning. As highlighted in CIHT’s *Better planning, better transport, better places* and *Fixing a failing planning system*, ‘predict and provide’ methods have regularly delivered unsustainable, car-centric development patterns. We have been clear that a decide and provide, or vision and validate, approach is essential to transitioning away from unsustainable development patterns.¹³

Encouraging a ‘vision-led’ approach is a positive step that we welcome. However, we suggest more clarity may be needed on what ‘vision-led’ means in practice. We feel the scope of a vision could be better defined within the NPPF itself and through accompanying guidance. Equally, it is important that responsibility for setting a vision is clearly defined. We believe it is important that government policy and guidance establishes a clear framework for vision-led planning. . We believe that updated local transport planning guidance and transport appraisal guidance should provide clear, prescriptive guidance on how vision-led and scenario planning aligns with national policymaking. We also believe that references to vision-led planning should be incorporated throughout the NPPF, not just in chapter 9.

Better integration of relevant guidance and documents in the NPPF would also support the establishment of a consistent framework for vision-led planning. CIHT has consistently called for the National Planning Policy Framework to signpost Manual for Streets.¹⁴ Explicit reference to transport-related guidance in the NPPF helps to integrate DfT methodologies into the planning system. CIHT would also welcome the publication of the updated Manual for Streets and offers its ongoing support in this process. We suggest direct reference to national guidance and key documents such as Manual for Streets, Local Cycling and Walking and Infrastructure Plans, Bus Strategies and Local Transport Plans in Chapter 9 of the NPPF.

We are concerned about the addition of ‘in all tested scenarios’ to paragraph 113 (previously paragraph 115). Paragraph 113 is the only provision that allows development to be refused on highways grounds and this lever is likely to be further weakened by the addition of ‘in all tested scenarios.’ DfT circular 01/22 states that *‘where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the*

¹³ CIHT (2019), [Better planning, better transport, better places](#), Chartered Institution of Highways and Transportation; CIHT (2022), *Delivering Sustainable Transport for housing developments: [Fixing a failing planning system](#)*, Chartered Institution of Highways and Transportation

¹⁴ CIHT (2023), [Response to the Levelling Up and Regeneration Bill: reforms to national planning policy](#), Chartered Institution of Highways and Transportation; CIHT (2021), [CIHT Submission to the Ministry of Housing, Communities and Local Government’s Planning for the future consultation](#), Chartered Institution of Highways and Transportation

*optimum design and transport infrastructure to realise this vision.*¹⁵ We appreciate that the addition of ‘in all tested scenarios’ aligns the NPPF with a scenarios-based approach, which can support a vision-led uptake in sustainable transport. However, we are concerned that low traffic scenarios may be modelled as a means of bypassing refusal based on poor transport outcomes, such as a detrimental impact on highway safety or poor sustainable transport provision. The NPPF must be clear that tested scenarios should be reasonable. Safeguards should be in place to protect against unrealistic traffic scenarios leading to development in areas with insufficient accessibility to sustainable transport modes and poor road safety outcomes.

We have previously raised concerns around the wording of paragraph 113 (previously paragraph 115). This paragraph allows applications to be refused “only” if there is an unacceptable impact on highway safety or “severe” impact on the surrounding road network.¹⁶ As outlined in *Fixing a failing planning system*, we strongly believe that the current wording of this paragraph does not provide sufficient power to refuse applications on sustainability grounds.¹⁷ We believe that the word “only” in this paragraph is particularly detrimental to sustainable development because it does not emphasise the requirement for sustainable transport provision and inhibits local authority’s powers to refuse car-led development. We suggest this paragraph should be redrafted to more robustly strengthen the requirements for sustainable transport in developments.

We would suggest that new paragraph 113 should be amended from

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, in all tested scenarios.

to:

Development should be refused on transport grounds if there would be unacceptable safety concerns or it is unable to demonstrate that the site can be effectively accessed by sustainable modes – including high quality walking, wheeling, cycling and public transport – rather than being car-dependent, would undermine the Local Transport Plan objectives and cause an unacceptable impact on the local highway network’s capacity and safety, as tested in accordance with key scenarios as defined by the DfT.

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

¹⁵ DfT (2022), [Strategic road network and the delivery of sustainable development](#), Department for Transport

¹⁶ CIHT (2022), *Delivering Sustainable Transport for housing developments: [Fixing a failing planning system](#)*, Chartered Institution of Highways and Transportation

¹⁷ CIHT (2022), *Delivering Sustainable Transport for housing developments: [Fixing a failing planning system](#)*, Chartered Institution of Highways and Transportation

Travel patterns are key to our health and environment. As outlined in our response to the Scottish Governments National Planning Framework 4 consultation, active travel and sustainable transport are fundamental to ensuring healthy placemaking.¹⁸ Greater modal uptake of walking, wheeling and cycling will improve public health outcomes through increased physical activity and improved air quality, while accelerating the shift to decarbonisation.

The planning system has a key role to play in supporting these outcomes by delivering places which are accessible and connected, where people's daily needs can be met within a reasonable distance of their home by walking, wheeling or cycling or using public transport. This includes encouraging car-free developments close to schools. As indicated above, paragraph 113 (previously paragraph 115) does not provide strong enough support for local authorities to reject applications if they were likely to have a detrimental impact on childhood obesity outcomes.

The NPPF can do more to promote active travel infrastructure. For example, we have previously suggested that paragraph 106 c) (previously 108 (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 are identified and 'provided for.'**"¹⁹

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

We suggest that Chapter 9: Paragraph 108 (previously paragraph 110) currently references local cycling and walking infrastructure plans, but we suggest should also reference Local Transport Plans. We also reiterate that Manual for Streets should be referenced.

Q72: No comment

Q73: No comment

Q74: No comment

Q75: No comment

Q76: No comment

Q77: No comment

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

We have previously suggested that paragraph 106 (d) (previously 108 d)) should be amended from

¹⁸ CIHT (2022), [CIHT response to NPPF4 Consultation](#), Chartered Institution of Highways and Transportation

¹⁹ CIHT (2021), [CIHT Submission to the Ministry of Housing, Communities and Local Government's Planning for the future consultation](#), Chartered Institution of Highways and Transportation

‘the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and’

to ‘the **local and national** environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and’²⁰^[OBJ]

We would suggest that the NPPF consider the important role that GBI can play. GBI helps to create climate resilient streets, roads and developments; at the same time roads house many GBI features whilst creating green linkages and reversing biodiversity fragmentation. GBI investment can support the net zero agenda, but our research suggests it is underutilised.²¹

We have previously suggested that the NPPF can do more emphasise the role of GBI in climate resilient planning with the following amendment to paragraph 133 (previously 136)²²:

436/133. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, **include other green and blue infrastructure (such as Sustainable Drainage Systems (SuDs)) where appropriate, and** that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

Question 79: No comment

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

CIHT is currently working on a [project](#), supported by DARE Hub, exploring how the highways sector can improve the UK road network in terms of resilience and adaptability to extreme weathers. As the leading voice of the highways, transportation, infrastructure and services profession, we are committed to positively influencing this agenda by working with members, stakeholders and decision-makers.

²⁰ CIHT (2021), [CIHT Submission to the Ministry of Housing, Communities and Local Government’s Planning for the future consultation](#), Chartered Institution of Highways and Transportation

²¹ CIHT (2023), [Green and blue infrastructure: A transport sector perspective](#), The Chartered Institution of Highways and Transportation

²² CIHT (2023), [Response to the Levelling Up and Regeneration Bill: reforms to national planning policy](#), Chartered Institution of Highways and Transportation

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

The planning system should be generating decisions that are demonstrably compatible with the government's overall Net Zero target in 2050 and the decarbonisation pathways in the 5-year carbon budget. Repeated legal challenges to individual schemes and the overall Road Investment Strategy (RIS) suggest that in the highways sector this is not routinely true.

While not directly relevant to the revised NPPF, one simple action the government could take would be to provide guidance to planning authorities that removes the ambiguity around the compatibility of future growth in traffic volume with the current, legally binding carbon budgets. As an example, the Climate Change Committee's Balanced Net Zero Pathway in the current 6th Carbon Budget assumes:

Total car miles fall by 9% by 2035 relative to the baseline. This is driven by modal shift from cars to walking, cycling (including e-bikes) or public transport, an increase in average car occupancy and a reduction in travel from factors such as increased working from home. The suite of traffic growth projections used by DfT to inform transport project appraisal however show traffic rising by between 8% and 54% between 2025 and 2060.

This is unhelpful and leaves the public, scheme promoters and transportation professionals unsure as to the basis on which decisions about road schemes should be made. This uncertainty is also likely to reduce the willingness of the engineering and construction supply chain to invest in the skills and capacity needed to improve productivity of scheme delivery adding unnecessary cost at a time when resources are already limited.

Q82: No comment

Q83: No comment

Q84: No comment

Q85: No comment

Q86: No comment

Q87: No comment

Q88: No comment

Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?

We support raising fees to ensure an effectively resourced planning service that can integrate planning and transport as required and has the resources and skills to do so.

Q90: No comment

Q91: No comment

Q92: No comment

Q93: No comment

Q94: No comment

Q95: No comment

Q96: No comment

Q97: No comment

Q98: No comment

Q99: No comment

Q100: No comment

Q101: No comment

Q102: No comment

Q103: No comment

Q104: No comment

Q105: No comment

Q106: No comment