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Planning for the Future Consultation  
Ministry of Housing, Communities and Local Government  
3rd Floor, Fry Building  
2 Marsham Street  
London SW1P 4DF

29<sup>th</sup> October 2020  
Ref: NT/PFTF

Dear Rt Hon Robert Jenrick MP,

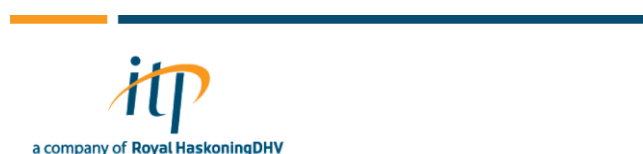
### **Re: Planning for the Future**

The Planning White Paper proposes a radical reform of the planning system in an attempt to simplify and speed up the planning of new homes, and to better engage local communities through decision-making processes. The current system is described as too complex, too lengthy, and untrustworthy; with little focus on creating beautiful places. It is suggested that the planning system is a major reason why not enough new homes are being built.

We agree with the Government that the planning system is complex and bureaucratic. Few people are confident when they come to interact with it – either through making a planning application or, critically, when new development is proposed near to their homes and communities. This is exacerbated by the trend for new homes to be of variable quality, often with little consideration for local context, which does not engender confidence in ‘the system’.

ITP warmly supports Government’s intention to reform the planning system, but do not agree that it can be considered the sole block to delivering new homes. [Research by the Local Government Association](#) shows that over 300,000 homes/annum have been granted planning permission in recent years, and over 1,000,000 homes have been granted permission but not built by developers in the last decade. As such we hope that Government will also be considering the other factors which impact on the delivery of housing - including issues around housing land supply and pre-emptive speculation on its value.

Our thoughts on the proposals in the White Paper are summarised below, alongside practical suggestions for how we believe the system could be improved. These thoughts draw on our experience as sustainable transport planners who often work with local planning and transport authorities to identify locations for strategic housing and employment that will maximise sustainable mobility outcomes over the long-term.



### Transport and land-use planning should go hand-in-hand

One of our key concerns is that planning for sustainable transport connections has not been given much prominence within the White Paper – with only five references to ‘transport’ and two references to ‘carbon’ throughout. Our experience, and lessons from elsewhere in Europe, teach us that successful, sustainable, high quality places must be designed around high-quality active travel and public transport networks. The White Paper does note (on page 57) the importance of maximising walking, cycling and public transport opportunities when identifying land for inclusion within designated ‘growth’ areas. However this overlooks that:

- Sustainable transport opportunities should inform whether an area can be designated for ‘Growth’, ‘Renewal’ or ‘Protection’, rather than simply be considered once such designations have been made.
- The wording is very similar to that in the existing National Planning Policy Framework and accompanying guidance, which the White Paper considers are worthy of reform.

ITP contends that the White Paper should seek to more fully integrate transport considerations into the planning process. Doing so would acknowledge the clear linkages between planning and transport which need to be considered if the design and delivery of more car-dependent communities is to be avoided in the future. A useful way to consider this might be through the concept of the ‘20 minute community’, whereby all day-to-day needs are readily accessible within a 20 minute walk or cycle trip from a resident’s home in a new development.

### The location of growth is crucial to sustainable mobility outcomes

The White Paper is silent on what we consider are two critical weaknesses of the existing system from a sustainable mobility perspective – Green Belt policy and the ‘Call for Sites’.

Many Local Plans do not start life with a truly objective analysis of which locations will genuinely create sustainable places that maximise the scope for walking, cycling and public transport. Instead they tend to be hampered by treating Green Belt as sacrosanct, which means that growth is pushed out to locations remote from the original sources of housing demand. This requires new residents to travel further, often leaving little choice but to travel by car. This has a very real impact on the places that Green Belt was designed to protect, by adding to congestion within existing towns and cities, reducing the quality of the environment, increasing carbon emissions, and reducing air quality. Sensitive release of Green Belt for the right kind of development can avoid this problem and deliver homes in the right places - where high-quality sustainable transport is easier to deliver.

The ‘Call for Sites’ process also tends to result in car dependent growth. With local authorities under pressure to deliver Local Plans and allocate new housing, too much emphasis can be placed on sites that are available now, rather than those that are well-located in relation to current and potential future sustainable transport links. ITP’s view is that local authorities should play a more proactive role in the coordination of development across multiple growth sites/phases within large sites. This is where we feel greatest scope exists to achieve direct, convenient and cohesive cycle network and local public transport routes that offer a genuine alternative to private car use.

We sincerely hope that the three simple Growth/Renewal/Protection designations remove the need for a ‘Call for Sites’ from the development planning process, rather than simply reinforcing the Green Belt and forcing new development to locations further from the places and economies that drive demand for housing growth.

### Who is the arbiter of beauty?

The desire to create beautiful places is strongly supported. However, we would welcome more detail on how the fast track for beauty would be delivered in practice.

ITP's vision for beauty comprises development that creates a mix of land uses, people-focused places where walking and cycling are the first choice for everyday local trips to local facilities that encourage social interaction and foster creation of community. It incorporates tree-lined streets with car parking sensitively designed-in and 'hidden' from view, with high quality transport interchanges enabling people to get where they want to go by public transport and combine their journeys with convenience shopping and socialising. In short, our vision encapsulates the conditions that create low carbon communities.

The images in the White Paper did not appear to feature these kind of places - underlining the subjective nature of beauty, and the challenge involved in allowing it to fast-track growth.

### The overhaul of the Plan-making process is broadly welcome

Proposals to streamline the Local Plan-making process, and truncate the size of Plan documents, in part through the adoption of a rules-based approach, sound sensible. We also support the focus on greater guidance for major development sites through Local Plans.

We are concerned, however, that the drive to do this more quickly (within 30 months), while adopting new digital map-based technology and more extensive local consultation will be a significant challenge. It could also lead to a greater reliance on sites that are known to be deliverable (i.e. through call for sites), rather than those in truly sustainable locations.

We suggest that any planning system reform needs to be backed by significant funding for local authorities to aid capacity building and expansion of IT capabilities. Any rules-based system must also be backed by regulatory support that ensures compliance, otherwise it is currently relatively easy for developments to demonstrate compliance with policies intended to maximise sustainable mobility outcomes, whilst still generating high levels of on- and off-site car use to the places people actually want (or need) to travel to. Relying on national policy and local rules causes concern, because it is not clear how local conditions can be properly taken into account and, as noted above, the policies set out in the existing NPPF have all often resulted in sub-optimal development.

We support the bold ambitions to create a planning system that delivers sustainable, beautiful places. We hope that our comments set out above, and in the specific responses to the consultation questions enclosed with this letter, will help the new approach achieve the government's aspirations.

Yours sincerely



Neil Taylor, Director  
For and on behalf of ITP



Geoff Burrage, Associate Director

**1. What three words do you associate most with the planning system in England?**

Complex, conflicted, creaking.

**2(a). Do you get involved with planning decisions in your local area?** [Yes / No]

Yes, nationally as a consultancy.

**2(b). If no, why not?** [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

**3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?** [Social media / Online news / Newspaper / By post / Other – please specify]

Digitising planning will make it more accessible. Local authority websites and the current way of setting out the status of plans is confusing and inconsistent and the new system should simplify this. Having access to digital data will make it easier to undertake assessments as part of the planning process and enable various agencies and consultancies to undertake a range of analyses.

**4. What are your top three priorities for planning in your local area?** [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

Our top priorities for transport are to:

- 1) Ensure we maximise the opportunity for people to walk, cycle and use public transport for their day to day travel needs.
- 2) Ensure sustainable travel options are at the heart of development design, enabling effective integration between modes, and
- 3) Ensure sustainable transport options and services are available at first occupation.

**5. Do you agree that Local Plans should be simplified in line with our proposals?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, but the changes must be supported by proper funding if local consultation is going to be at the heart of the new plans. More thought needs to be given to how the aspirations of the duty to cooperate can be captured in the new plan making process. The categorisation of land into three simple designations could potentially worsen issues related to Green Belt and call for sites resulting in growth happening in the wrong places. However, it could allow supporting transport strategies to be more easily developed and integrated with development proposals.

**6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?** [Yes / No / Not sure. Please provide supporting statement.]

No. Nationally-set policies have not tended to result in sustainable outcomes and more detail is therefore required about how national policy will be developed and implemented and how local circumstances will be taken into account.

**7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?** [Yes / No / Not sure. Please provide supporting statement.]

No. The White Paper does not set out sufficient detail about how the sustainable development test would take into account the complexity of issues at a local level or how it would remain a robust measure that delivers sustainable outcomes. More detail should be provided on this as it is a key element of the proposed reforms. All too often schemes that have little chance of being truly sustainable, due to their location or lack of sustainable transport infrastructure, are permitted under the current system and considered to reflect sustainable development. If a more robust process can be developed then this would be welcomed.

**7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?**

Authorities should be required to contribute to ‘regional transport strategies’ that set out the requirements for active and sustainable transport infrastructure across boundaries.

**8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, although in practice the range of factors set out and the types of locations where housing demand is likely to be high, mean that the potential for this to result in a more streamlined process is questionable. However, the principle of delivering growth closer to the demand it serves is warmly welcomed.

**8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, although there may be scope to improve the range of facilities (schools, leisure, retail as well as transport) in towns through development, delivering dual benefits of more sustainable growth and better facilities for existing residents. Alternatively local authorities may be able to accommodate new settlements with a proper mix of day to day facilities within a 20 minute walk or cycle, alongside high quality public transport connections to places where people want to travel, and this should be supported.

**9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, but only where a robust Local Plan has been adopted with a high level of detail around the requirements for sustainable development and with growth areas in locations that can be served sustainably by public transport. The White Paper has not set out in sufficient detail on how this might be achieved.

**9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, for renewal areas but only where a robust Local Plan has been adopted with a high level of detail around the requirements for sustainable development. The White Paper has not set out in sufficient detail on how this might be achieved. For protected areas the Local Plan process should review the Green Belt to identify opportunities for appropriate release where this delivers the most sustainable outcomes and avoids the proliferation of car dependent developments some distance from existing places.

**9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, as this could allow the full extent of infrastructure to be considered. Development Consent Orders have been proven to be effective in securing long term sustained investment sustainable transport.

**10. Do you agree with our proposals to make decision-making faster and more certain?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, provided this is supported by sufficient funding for local authorities to avoid poor quality development being automatically granted consent.

**11. Do you agree with our proposals for accessible, web-based Local Plans?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, as a standardised and open architecture approach to plans and supporting data would allow for lower costs and greater transparency in the testing of sustainable transport options.

**12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, but only where this is supported by substantial funding to allow local authorities to deliver within 30 months.

**13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?** [Yes / No / Not sure. Please provide supporting statement.]

Not Sure. Often they seek to specify transport outcomes that reflect local views, which are currently outside their formal remit.

**13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?**

**14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, unlocking housing developments and delivering them faster will minimise the need for long term 'pump priming' of public transport services during the early stages of development, allowing commercial services to develop more quickly.

**15. What do you think about the design of new development that has happened recently in your area?** [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify]

Mostly ugly and poorly designed on the urban fringes of the cities that ITP has been working in. Few sites are well located for walking, cycling and public transport connections that permeate through the new homes and offer 'better than car' journey times to key local facilities and employment sites.

**16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?** [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

To meet climate change targets is central to all areas. This must involve a shift away from single-occupancy car journeys to walking, cycling and public transport. This will require behaviour change and it is essential that the location and form of development is delivered in

a way to facilitate this. The number of car trips accommodated through new development, must be minimised on already congested road networks, prioritising other modes.

**17. Do you agree with our proposals for improving the production and use of design guides and codes?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, a more robust requirement to incorporate good national design guidance into local design guides and codes is warmly welcomed. Often local authorities have failed to adopt national guidance, such as Manual for Streets, into their local guidance. This, alongside the impacts of reduced maintenance budgets leading to higher quality materials and street trees being designed out, has meant that the quality of many new developments is poor.

**18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, local authorities should have a chief officer for design and place making that has a brief that straddles transport, development management and strategic planning.

**19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, Homes England has the potential to contribute very positively to the quality of major new places and quality should be given greater priority.

**20. Do you agree with our proposals for implementing a fast-track for beauty?** [Yes / No / Not sure. Please provide supporting statement.]

Not sure, beauty is highly subjective. The images shown in the White Paper for example are not all consistent with our view on beauty and tend not to incorporate elements of good design with regard to transport. Any proposals for a fast track should be very clear about what the key ingredients for beauty are.

**21. When new development happens in your area, what is your priority for what comes with it?** [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]

That it is supported by high quality walking and cycling infrastructure 'beyond the red line', and appropriate public transport services and infrastructure that provide real alternatives to the private car.

**22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?** [Yes / No / Not sure. Please provide supporting statement.]

Not sure, it is not clear how the local levels could be set effectively from a national basis to take local issues, affordability and viability considerations into account. The overall aim to increase revenue in comparison to the existing system is however welcome as currently the infrastructure needs of new development are often not met.

**22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?** [Nationally at a single rate / Nationally at an area-specific rate / Locally]

The levy should reflect local circumstance and affordability. It could be helpful to set national boundaries (high and low tariff ranges), but with local levels determined to reflect local

conditions. For example, developments in poorly accessible locations should only be permitted if more significant contributions are provided. This, in turn, will encourage developments to come forward in more accessible places.

**22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?** [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

More value needs to be captured in order to make up the shortfall in infrastructure funding for sustainable transport, and maximise the land value uplift which is realised when development occurs in places where new public transport networks are introduced (such as around new rail stations, tram stops or bus interchanges). Consideration should be given to what the ultimate sustainable transport network should look like and work backwards to determine what this would mean for the Levy.

**22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, borrowing against certain future income will enable the investment in sustainable transport infrastructure in advance of development which is critical to allow early adopters to use new services.

**23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?** [Yes / No / Not sure. Please provide supporting statement.]

Yes, as change of use can significantly change travel demand and thus put pressure on local authority resources to maintain service provision.

**24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?** [Yes / No / Not sure. Please provide supporting statement.]

**24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?** [Yes / No / Not sure. Please provide supporting statement.]

**24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?** [Yes / No / Not sure. Please provide supporting statement.]

**24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?** [Yes / No / Not sure. Please provide supporting statement.]

**25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?** [Yes / No / Not sure. Please provide supporting statement.]

Not sure, although we believe that national guidance should be issued to reflect the need for funding for transport to prioritise sustainable transport investment in order to avoid car dependence.

**25(a). If yes, should an affordable housing 'ring-fence' be developed?** [Yes / No / Not sure. Please provide supporting statement.]

**26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?**



Any changes must take account of the need for people with protected characteristics to have equal and fair access to public transport services, including stops within easy reach of homes, level access for boarding and alighting, and appropriate infrastructure that is accessible for all.