

Written evidence submitted by Cycling UK [FPS 123]

Introduction

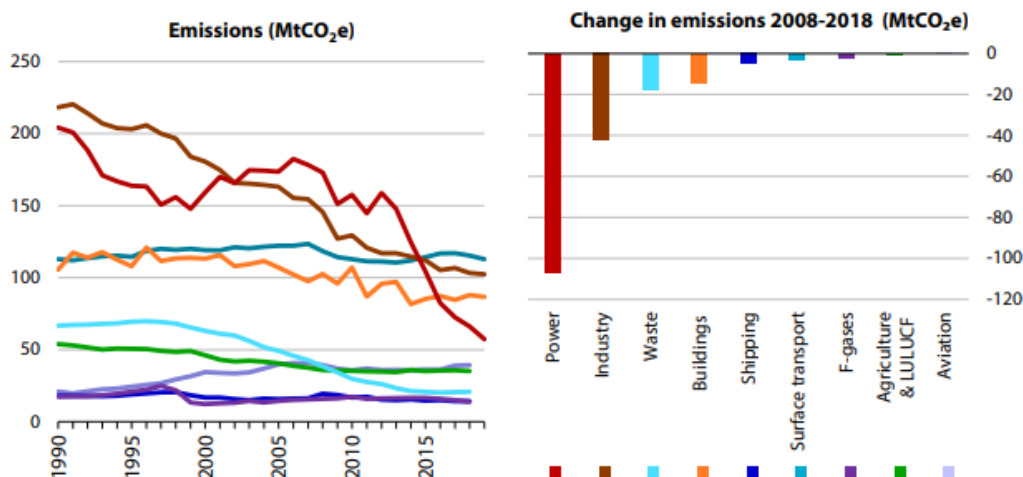
Cycling UK was founded in 1878 and has over 70,000 members. Historically known as ‘CTC’ or the ‘Cyclists’ Touring Club’, Cycling UK’s central charitable mission is to make cycling a safe, accessible, enjoyable and ‘normal’ activity for people of all ages and abilities. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits, both for individuals and society. We strongly welcome this inquiry.

Our response starts by outlining the vital role of planning policy in tackling the environmental, health and other impacts of transport. It documents how the planning system currently fails to support cycling and other sustainable transport, and instead promotes car-dependent development, contrary to the Government’s aim to decarbonise transport and its wider legal commitments to progressively decarbonise the economy. Although the White Paper’s introduction sets out admirable ambitions for sustainability, we fear that its proposals contain serious gaps and flaws, making it impossible to be confident that they would achieve the stated outcomes. If anything, they could make the situation worse.

Our concluding recommendations outline how the proposed planning reforms could instead result in development whose location and design supports cycling and other forms of clean and healthy travel, thereby avoiding even greater car-dependence.

The need to decarbonise transport

Planning could play a vital role in fulfilling the Government’s admirable aims to decarbonise transport, as set out on its document ‘[Decarbonising Transport: setting the challenge](#)’ (n.b. this paves the way for a Transport Decarbonisation Plan, due out later this year). Cycling UK has strongly welcomed the document’s 6-point vision for a zero-emissions transport system, and particularly its stated aim that: “*Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less...*”



Greenhouse gas emissions by sector 1990-2018 (source: [Committee on Climate Change \(2020\)](#), p72)

The UK’s territorial emissions of CO₂ in 2018 (i.e. excluding international aviation and shipping) amounted to 365.7Mt. Transport accounted for 136.8Mt of CO₂ emissions by end user, i.e. 37.4% of all domestic CO₂ emissions. Road transport was responsible for 123.3Mt of CO₂ emissions (i.e. 90% of total domestic transport emissions, and 33% of all territorial emissions). Cars accounted for 74.8Mt of these emissions.¹

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875508/final-greenhouse-gas-emissions-tables-2018.xlsx, table 20.

While other sectors (notably energy) have made good progress in reducing greenhouse gases, the transport sector's emissions have changed little since 1990. Transport's share of total greenhouse gas emissions (by end user) has therefore [increased steadily](#), from 18% in 1990 to 31% in 2018.²

Other reasons to reduce car dependence

Other compelling reasons to reduce our dependence on motorised travel include:

- *Congestion*: This is estimated to cost the UK economy [£30 billion a year](#).³
- *Air pollution*: Pollution, particularly nitrogen dioxide (NO₂) and particulate matter (PM_{2.5}) is estimated to contribute to [between 28,000 and 36,000 early deaths annually](#) in the UK,⁴ at an [economic cost of £20bn or more](#).⁵ Road transport is a substantial contributor to these deaths. The UK Government has faced several [successful legal challenges](#) over its failure to reduce pollution to within legal limits.⁶
- *Road danger*: 1,782 people were killed and another 158,596 were reported as injured (25,484 of them seriously) on Britain's roads in 2018. The economic costs of these casualties was estimated to be [£35bn](#).⁷
- *Physical inactivity*: Around [11.8m women and 8.3m men are insufficiently active](#) to meet recommended guidelines.⁸ Physical inactivity increases the risks of cardiovascular disease, type 2 diabetes, colon cancer, dementia, fractures and depression, while increasing all-cause mortality by 30%. It is estimated to cost the UK [£7.4bn annually](#).⁹

In response to the Government's recent consultation on its Transport Decarbonisation Plan, [Cycling UK's response](#) (see [full](#) and [summary](#) versions)¹⁰ therefore calls for policies aimed at:

- Reducing travel overall – e.g. investing in broadband to reduce the need to travel for business meetings etc; and...
- Reducing the lengths of journeys – e.g. by planning and locating new developments such that housing, employment and retail opportunities are closer to one another (i.e. “destination shifting”); as well as...
- Enabling people to switch from car travel to healthier and more sustainable alternatives (i.e. “mode shifting”).

The planning system needs to support all of these aims. Development needs to be concentrated in places with good public transport provision, in order to avoid car dependence, and the resulting poor conditions for cycling and walking (as well as for public transport itself). Conversely, if development takes place in car-dependent locations (i.e. those without good public transport), this inevitably creates pressures for car-dependent design, e.g. with large amounts of land being given over to roadspace and car parking. This not only reduces the opportunities to provide greenspace and a pleasant urban realm, but it also results in lower residential densities. That in turn deprives public transport of the density of demand that it needs to be economically viable, while also increasing the length of walking and cycling journeys. It therefore becomes far harder to achieve the aim of becoming a ‘[20 Minute Neighbourhood](#)’¹¹ or a ‘[15 Minute City](#)’¹² (where people can meet their main everyday needs within a short walk from home, with good options for cycling and/or public transport). These concepts are increasingly seen as being essential for creating sustainable, healthy and attractive living environments.

² www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2018, table 19.

³ www.clearview-intelligence.com/blog/were-jamming-and-not-in-a-good-way-the-cost-of-congestion-on-the-uks-roads-is-30-billion

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf

⁵ www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

⁶ www.clientearth.org/government-loses-third-air-pollution-case-judge-rules-air-pollution-plans-unlawful

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833803/ras60004.ods

⁸ www.bhf.org.uk/informationsupport/publications/statistics/physical-inactivity-report-2017

⁹ www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health#why-promote-physical-activity-in-your-professional-practice

¹⁰ www.cyclinguk.org/blog/decarbonising-transport-being-led-science

¹¹ www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods

¹² www.c40knowledgehub.org/s/article/How-to-build-back-better-with-a-15-minute-city?language=en_US

Car-dependent development has for too long been the norm. The Government's planning system reforms must instead seek to create low-carbon, healthy and attractive developments, thereby fulfilling the ambitions of the White Paper's opening chapter.

Current failings of the planning system

For decades, local and national planning policies have ostensibly supported sustainable transport objectives. Yet a recent [report by Transport for New Homes](#) found that:¹³

- Most housing developments are linked with road improvements– with locations often being chosen specifically to provide developer funding for roads. Road access is often seen as more important than proximity to town centre facilities or public transport.
- Large areas of land in new developments are given over to road and car parking, with little space left for tree planting, green space or an attractive public realm.
- As a result, residential densities are often as low as 20 dwellings per hectare. This worsens car dependence, by increasing the walking or cycling distances to key destinations, and by making demand for public transport services less concentrated.
- Conversely, walking and cycling routes, where they exist, are often out of the way, unlit and poorly surfaced. Good walking, cycling and public transport connections to other nearby destinations are even rarer.

Notable exceptions do exist, such as Leeds's [Climate Innovation District](#)¹⁴ and the [Marmalade Lane development](#)¹⁵ in South Cambridgeshire, showing what can be done. Yet the fact that they are exceptional proves the point.

These issues have a long history. For decades, planning policies both nationally and locally have paid lip-service to the aims of supporting sustainable transport objectives:

- [Planning Policy Guidance note PPG 13](#),¹⁶ first issued in 1994 and revised in 2001 and in 2011, listed "*reduc[ing] the need to travel, especially by car*" as one of its three key objectives.
- Although England's [2012 'National Planning Policy Framework'](#) (NPPF)¹⁷ included an unhelpful "*presumption in favour of sustainable development*" (with "sustainable" being inadequately defined, thereby hampered local authorities' ability to reject developments in unsuitable locations), its 12 key principles still required that planning should "*Actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*"

Further revisions were made to NPPF in 2018 and 2019. The [current version](#) contains the admirable statements on the need to "*achieve healthy, inclusive and safe places*".¹⁸

Yet, in practice, this is not happening, even in flagship "Garden Communities" developments. The [Garden Communities prospectus](#),¹⁹ issued in 2018 by the Ministry for Housing, Communities and Local Government (MHCLG), says that communities should "*be largely self-sustaining and genuinely mixed-use*", with transport options that will "*support economic prosperity and wellbeing for residents. This should include promotion of public transport, walking, and cycling so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services.*"

¹³ www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf

¹⁴ <https://citu.co.uk/citu-places>

¹⁵ www.wearatown.co.uk/developments/marmalade-lane

¹⁶ <https://webarchive.nationalarchives.gov.uk/20120919201915/http://www.communities.gov.uk/documents/planningandbuilding/pdf/1758358.pdf>

¹⁷ www.admin.ox.ac.uk/media/global/wwwadminoxacuk/local/sites/estatesservices/documents/ouss/National_Planning_Policy_Framework_2012.pdf

¹⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805688/Garden_Communities_Prospectus.pdf

However, an [analysis by Transport for New Homes](#) of plans for 20 Garden Communities²⁰ found that:

- Only one of the settlements (Aylesham) offered amenities and a railway station within 1 mile of every home – and Aylesham’s station only has an infrequent service, with no safe cycle route to reach it. The other settlements were even more car-dependent. None had an all-day bus service throughout the week, the nearest rail station was up to 7 miles away, and cycle access to nearby towns and other destinations (including rail stations) were often long and dangerous.
- Around half of the Garden Communities were associated with new or enlarged motorway junctions, while 90% appeared to be associated with road capacity increases of some kind, to ‘mitigate’ the additional car travel they would generate. In many cases, their location seemed to have been chosen specifically to help fund these road schemes. As Transport for New Homes noted: *“This seems to put the cart before the horse.”*
- Many Garden Towns involved creating new estates on a new ring road, rather than extending the town in ways that would facilitate walking or cycling to the town centre.

In short: car-dependent development is still the norm, even in flagship developments, despite the ‘fine words’ in national planning policy. Car-dependence in more routine housing developments is even more entrenched.

This situation is not helped by paragraph 109 of the [NPPF](#), which insists that *“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.* This makes it very difficult for local authorities to reject developments, even if they are expected to generate very significant volumes of additional motor traffic.

Another obstacle is that the strategic objectives adopted by Homes England (the arms-length body set up in 2018 to accelerate house-building) include nothing on climate change or other environmental impacts of house-building.²¹ We urge that this should be rectified.

Understanding the root causes of the planning system’s failings

An [analysis by KPMG for Greener Journeys](#)²² sought to understand the root causes of these problems, and how they might be addressed. It identified the following problems:

- *Barrier 1:* Responsibility for local public transport, highways and housing is fragmented, particularly in two-tier areas (where the county council deals with highways and public transport, with the district councils being responsible for with planning). This results in siloed plan-making and decision-making.
- *Barrier 2:* National planning guidance is insufficiently clear on the need for new housing developments to be planned to support sustainable transport. This undermines the ability of planning authorities to secure good walking, cycling and public transport provision (or the funding needed for this).
- *Barrier 3:* Local authorities do not have sufficient long-term funding of their own, to plan strategically and deliver with certainty.
- *Barrier 4:* Current developer contribution mechanisms (section 106 agreements and the Community Infrastructure Levy) do not explicitly capture the uplift in land values associated with high-quality sustainable development, and are therefore insufficient to fund strategic sustainable transport.

²⁰ www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf

²¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf

²² https://greenerjourneys.com/wp-content/uploads/2019/02/20190213_KPMG-Sustainable-Transport-and-New-Housing-Report-for-TKH_FINAL....pdf

- *Barrier 5:* Current approaches to economic appraisal do not address the climate, air quality, health, well-being and other benefits of integrated sustainable transport (or indeed of good access to green space and a quality public realm).
- *Barrier 6:* The design, pattern and location of new housing development often preclude sustainable transport provision. Issues include pressure on planning authorities to accept large development sites in unsustainable locations (to meet housing targets), or to locate development on the edges of towns, where they have good road access but are disconnected from town centres (e.g. where they are separated by ring roads) or from rail and bus stations.

Its recommendations have shaped our own recommendations at the end of this submission.

Concerns about the White Paper

It is as yet unclear whether the White Paper's policies will address these endemic problems. However, as things stand, we fear that it is unlikely to do so:

- It hardly mentions transport, and "sustainable transport" is not mentioned at all, despite its prominence in MHCLG's 2019 [National Planning Policy Framework](#) (see chapter 9).
- It proposes removing local authorities' existing 'duty to cooperate', without giving any rationale for this, and without suggesting how else strategic consideration might be given to most appropriate development locations from a sustainable transport perspective.
- There is no clarity on whether (let alone how) the definitions of 'growth', 'renewal' and 'protected' areas will guide housing or other developments towards locations which support sustainable transport patterns, rather than car-dependence.
- Similarly, it is unclear whether (or how) the proposed single sustainability test will reflect the likely transport patterns arising from a proposed development location, and whether these support or conflict with sustainability, health and other objectives.
- The reduced scrutiny of planning applications is likely to erode (rather than strengthen) the capacity of both local authorities and communities to ensure that developments are designed in accordance with sustainable transport principles.
- The White Paper's proposals for a new, simplified, 'Infrastructure Levy' could be highly beneficial, however it is unclear how much funding it is likely to raise, or whether it will be used to deliver sustainable transport provision or road schemes.

Without clarity about the proposed National Design Code, the proposed new NPPF, the national sustainability test, the infrastructure levy and the digital mapping process, it is impossible to know whether or not the White Paper's proposals will foster the sustainable transport needed for attractive, safe, healthy, sustainable and vibrant local communities.

However, the one tool that has been published – namely a [proposed algorithm for allocating housing](#)²³ – does not inspire confidence. Its underlying assumption is that the need for increased housing in an area can be identified by comparing house prices and average earnings in that area. Where there is a high ratio of median house prices to median wages for employment, this is assumed to signify poor house price affordability, and hence a need for additional housing in the area, so as to bring down house prices.

This approach has faced strong criticism from groups concerned with interests in planning, architecture and the environment,²⁴ and [from MPs](#) from across the political spectrum.²⁵ It takes no account of the fact that high house prices in leafy green-belt areas reflect an environmental

²³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/927157/200805_Changes_to_the_current_planning_system.pdf

²⁴ See www.ribaj.com/culture/planning-reform-white-paper-permitted-development-rights-riba-president, www.cpre.org.uk/opinions/planning-reforms-an-attack-on-local-democracy, www.rtpi.org.uk/press-releases/2020/august/planning-reforms-could-slow-house-building-in-england-if-not-adequately-resourced-warns-rtpi/, and <https://friendsoftheearth.uk/climate-change/planning-reforms-are-bad-news-communities-and-environment>

²⁵ <https://hansard.parliament.uk/commons/2020-10-08/debates/2496DD54-7CE6-4393-B8E0-477A7084D8FD/PlanningAndHouseBuilding>

quality which needs to be protected for other reasons (e.g. the retention of protected habitats, landscapes etc). Nor is it reasonable to assume that people who live in these areas are earning wages in the local area – for instance, they may well be high-earners at London-based workplaces, or retired. Nor does this approach help to regenerate economies in left-behind towns, in pursuance of the Government’s ‘levelling up’ agenda.

Above all though, the resulting developments would be highly car-dependent, due to a lack of sustainable transport options. Cycling UK believes it is critical to avoid this.

Specifically, we recommend that any sustainability appraisal should reflect walking, cycling and public transport accessibility to key destinations, making use of the [Journey Time Statistics data](#) provided by the Department for Transport (DfT).²⁶

The role of cycling and walking

In addition to the concerns identified above, we are also concerned that the White Paper’s policies do not appear to incorporate the DfT’s recently-adopted commitments to cycle-friendly planning and infrastructure design.

Cycling UK has strongly supported the Government’s [‘Gear Change’ vision for cycling and walking](#),²⁷ issued in July along with a new Local Transport Note (LTN 1/20) on [Cycle Infrastructure Design](#).²⁸ These admirable documents aim to strengthen progress on meeting the targets of the Government’s first [Cycling and Walking Investment Strategy \(CWIS1\)](#).²⁹ Those targets include an aim to double ‘cycling stages’ by 2025 (based on 2013 levels – n.b. a ‘stage’ is either a whole or part of a journey made by one transport mode, so a ‘cycling stage’ could for instance involve cycling to a train station). They also include aims to increase walking overall, and particularly walking to school. A second Cycling and Walking Investment Strategy (CWIS2) is due for publication in Spring 2021.

The section of ‘Gear Change’ relating to development planning is worth quoting in full:

“We will ensure that all new housing and business developments are built around making sustainable travel, including cycling and walking, the first choice for journeys.

“The purpose of the planning system is to contribute to the achievement of sustainable development. We expect sustainable transport issues to be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote cycling and walking are pursued. Planning policies should already provide for high quality cycling and walking networks, green spaces and green routes, and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).

“While many local plans already say the right things, they are not always followed consistently in planning decisions. Developments often do little or nothing meaningful to enable cycling and walking. Sometimes they make cycling and walking provision worse. We want new developments to be easily and safely accessible and navigable by foot and bike, and to make existing cycling and walking provision better. We will work with the Ministry of Housing, Communities & Local Government and the Local Government Association to place cycling and walking provision at the heart of local plan making and decision taking for new developments. One of Active Travel England’s functions will be as a statutory consultee within the planning system to press for adequate cycling and walking provision in all developments of over a certain threshold, and provide expert advice on ways in which such provision can be improved.

“We will work with Active Travel England and other key stakeholders to ensure that the importance of securing high quality cycling and walking provision is embedded within the planning system. We will

²⁶ www.gov.uk/government/statistical-data-sets/journey-time-statistics-data-tables-jts

²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

²⁸ www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120

²⁹ www.gov.uk/government/publications/cycling-and-walking-investment-strategy

also consider the role the emerging National Model Design Code and revisions to the Manual for Streets can play in delivering high quality, accessible, secure and safe cycle storage.”

‘Gear Change’ then goes on to say that:

“Active Travel England will examine all applications for funding and refuse any that are not compliant with the new national standards. It will inspect finished schemes and ask for funds to be returned for any which have not been completed as promised, or which have not started or finished by the stipulated times. [It will] also begin to inspect, and publish annual reports on, highway authorities, whether or not they have received funding from us, grading them on their performance on active travel and identifying particularly dangerous failings in their highways for cyclists and pedestrians.”

This is all admirable, yet neither the Cycle Infrastructure Design guidance (LTN 1/20) nor the proposed role of Active Travel England are mentioned in MHCLG’s Planning White Paper. Conversely, the White Paper does mention “*our wider vision for cycling and walking in England*” (see p46), but instead suggests that this will be supported by its proposed ‘National Design Code’ along with a revised ‘Manual for Streets’ – neither of which appears in either of DfT’s new cycling and walking documents.

This disjunct appears symptomatic of a serious failure by MHCLG and DfT to integrate transport and planning policy – not just in relation to cycling and walking, but other aspects of sustainable transport as well. It is vital that this is rectified, if planning policy is to support a healthy, low-emissions transport future within a net-zero economy.

Recommendations

Cycling UK’s recommendations for strengthening the White Paper’s proposals are as follows:

- Planning policy should take full account of the transport implications of proposed development locations, and their CO₂ and other impacts (environmental, health etc), with the aim of promoting sustainable travel and avoiding car-dependent developments. The proposed sustainability assessment should take account of accessibility to key destinations, making use of the Department for Transport’s [Journey Time Statistics data](#). Planning authorities should be mandated to refuse planning applications in locations that are likely to become car-dependent.
- The strategic objectives set out in Homes England’s [Strategic Plan](#) should include reducing the carbon and other adverse environmental impacts of house-building.
- The process for securing developer contributions should fully capture the increased value of the land to be developed. It should secure the funding for whatever sustainable transport provision is needed to prevent the development becoming car-dependent.
- The planning and design of developments should be guided by the concepts of ‘[15 Minute Cities](#)’ or ‘[20 Minute Neighbourhoods](#)’, with road layouts and other infrastructure seeking to maximise the use of walking, cycling, public and shared transport. Provision for private car parking should be minimised accordingly.
- New development masterplans should, from the earliest design stages, incorporate cycling and walking networks planned and designed in the Government’s excellent new [Cycle Infrastructure Design guidance](#) (or the proposed new ‘Manual for Streets’, see White Paper pp46-48, if this incorporates or subsumes the CID guidance). Local streets should be designed on the assumption of a 20mph speed limit.
- Ample, secure cycle parking provision should be made at all developments (including residential developments), for both their occupants (e.g. residents or employees, as appropriate) and for visitors.
- Local authorities’ powers to enforce planning conditions should be strengthened, e.g. to ensure compliance with conditions relating to sustainable and active travel provision.
- Active Travel England should be a statutory consultee on significant new developments.

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