

Written evidence submitted by Sustrans [FPS 151]

Sustrans is the charity making it easier for people to walk and cycle.

Our vision is a society where the way we travel creates healthier places and happier lives for everyone. Sustrans has two priorities: the National Cycle Network and liveable cities and towns for everyone.

National Cycle Network

We are the founders and custodians of the National Cycle Network (the Network), a UK-wide network of traffic-free and quiet road paths for everyone, connecting cities, towns and countryside, loved by the communities they serve. In 2017-18 4.4 million people used the Network, helping to save £88 million through reduced road congestion.

We work with stakeholder partners to safeguard, improve and grow the Network, and will create 5,000 new traffic-free miles by 2040, helping to contribute to the UK's 2050 net-zero target and level up access to work and leisure between communities.

Liveable Cities and Towns

We also bring people together to create places with clean air and green spaces, where friends and facilities are just a short walk away.

Cities and towns should be places that prioritise the people who live and spend time there. For too long they have been designed around cars, leaving less space for socialising, walking, cycling and spending time in; things that make our lives better and add to our happiness. Car-dominated spaces create congestion and damage our environment and health. They harm people who are already disadvantaged the most.

Central to our vision for cities and towns is the 20-Minute Neighbourhood, where residents are able to meet most of their needs within a 20-minute return walking trip. This means focusing on developing and building neighbourhoods for everyone where homes are close to shops, green space and schools, streets are safe for walking and cycling, and public transport is accessible.

1. Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

Our response to this question is structured as follows;

- The planning system is not working as it should be and has been failing to create beautiful or vibrant neighbourhoods. Too many new developments are built in remote locations, or are designed in ways that lock people into car dependency and have little in the way of services and amenities within walking distance.
- Planning should ensure developments are built in the right places, to better building design standards, and ensure our neighbourhoods are attractive places to live and where there is a greater incentive to walk, cycle or use public transport, rather than drive.
- In order to achieve this, the Government should:

- Adopt the 20-Minute Neighbourhood concept as a central principle of the planning system, including both the National Planning Policy Framework and Local Plans
- Produce updated planning guidance to create active neighbourhoods that prioritise walking, cycling and public transport and reduce demand for car use
- Embed the National Cycle Network within the National Planning Policy Framework as a UK-wide network of national importance
- Comments on proposals, outlined in the Government's Planning for the Future white paper, including:
 - simplification of Local Plans
 - streamlining the development management content of Local Plans
 - replacing existing legal and policy tests for Local Plans with a consolidated test of "sustainable development"
 - automatic permission in principle for areas for substantial developments
 - making decision-making faster and more certain
 - a 30 - month statutory timescale for the production of Local Plans
 - improving the production and use of design guides and codes
 - establishing a new body to support design coding and building better places
 - considering how design might be given greater emphasis in the strategic objectives for Homes England
 - replacing the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy
 - the impact of proposals raised in the white paper on people with protected characteristics as defined in section 149 of the Equality Act 2010

Is the current planning system working as it should do?

The planning system has been failing to create beautiful and vibrant neighbourhoods or communities.

Too many new developments are built in remote locations, or are designed in ways that lock people into car dependency and have little in the way of services and amenities within walking distance¹². This is bad for our health, our communities and the environment.

Planning should ensure developments are built in the right places, to better building design standards, and ensure our neighbourhoods are attractive places to live and where there is a greater incentive to walk, cycle or use public transport, rather than drive.

What Changes need to be made?

In order to address this, we have three core recommendations for reforming planning that run through our response:

- **Adopt the 20-Minute Neighbourhood concept as a central principle of the planning system, including both the National Planning Policy Framework and Local Plans**
- **Produce updated planning guidance to create active neighbourhoods that prioritise walking, cycling and public transport and reduce demand for car use**
- **Embed the National Cycle Network within the National Planning Policy Framework as a UK-wide network of national importance**

¹ [BBC News, 2018, Young couples "trapped in car dependency"](#)

² [BBC, 2020, New UK housing "dominated by roads"](#)

Adopt the 20-Minute Neighbourhood concept as a central principle of the planning system, including both the National Planning Policy Framework and Local Plans

We are calling for the 20-Minute Neighbourhood principle for all cities and towns to be embedded in the revised National Planning Policy Framework (NPPF).

Sustrans wants to see the 20-Minute Neighbourhood concept adopted as a central principle of the planning system, where residents are able to meet most of their needs within a 20-minute round walking trip.

If this principle was put at the heart of plans for new developments in cities and towns and the approval process, new communities would be made up of compact, mixed use developments, where workplaces, schools and shops are close to homes and integrated with the transport system focusing on walking, cycling and public transport. This would support beautiful, healthy and inclusive communities.

This principle should also be used to bring an end to developments going ahead where local amenities are not found within a 20-minute return walk from new homes as a result of bad design or being in the wrong location.

Update planning guidance to create active neighbourhoods that prioritise walking, cycling and public transport and reduce demand for car use

Currently, Planning Practice Guidance does not adequately include guidance on the need to implement high quality cycling and walking infrastructure in new developments and should be reformed. There should be specific planning guidance on embedding walking and cycling infrastructure in new developments, to aid planners. This will complement the work of Active Travel England that will act as a statutory consultee within the planning system to press for adequate cycling and walking provision in developments over a certain threshold, and provide expert advice on ways in which such provision can be improved.

We are calling for planning guidance and other complementary documents to be revised and updated to ensure that the street layouts of new developments prioritise travel by walking, cycling and public transport, while at the same time reducing demand for car use.

Similarly to places such as Houten, in the Netherlands, streets within new developments should be fully accessible by walking and cycling, with public transport connecting different areas within a development.

Vehicles, however, should only be able to access different areas within a wider development area from a ring road/circular road, and should not be able to cross between neighbourhoods. To access a different area by car, drivers would need to use the ring road.

This would ensure that walking, cycling or public transport are the quickest and most convenient ways to travel, demonstrating the importance of reducing demand for driving alongside making it easier for people to walk and cycle, in England. In the past, we have had cases where new towns were built with comprehensive networks of cycle routes, such as Stevenage, but they are poorly used because travelling by car is more convenient. This must be avoided if we are to change the way people travel around.

To support this, car parking spaces in new developments should be limited, and developments should be car-free where appropriate.

Embed the National Cycle Network within the National Planning Policy Framework

The National Cycle Network should be embedded within the NPPF and updated planning guidance as a UK-wide network of national importance.

The Network connects to every major town and city. It should be regarded as a national asset in the NPPF and should be referenced as something that new developments should connect people to. Local planning authorities should assist in the completion of the Network and key links to and from the Network through the mechanism of new development. Currently, the vast majority of new developments do not create convenient and safe links to existing routes which would enable more people to walk and cycle between and within settlements.

Although the Network is not currently referred to in the NPPF, it is referred to in the national planning policies of the devolved nations. We are asking for this to be rectified, as there should be a consistency of approach for what is a UK-wide national infrastructure asset.

The Network has strong government support, most recently confirmed in the Government's Cycling and Walking Plan for England, Gear Change. The Government has pledged to "improve the Network, especially where it is most useful for everyday journeys, to significantly increase funding, remove obstacles, and increase the proportion that is traffic-free or protected from traffic"³.

Proposals for the simplification of Local Plans

We agree that there are advantages in simplifying Local Plans, but in reforming the planning system the Government must ensure that high quality cycling and walking provision is placed at the heart of Local Plan-making and decision taking for new developments. To achieve this, the Government should mandate high quality cycling/walking provision through legislative change and/or revisions to national planning policy and guidance.

The Government must require sustainable transport to be integrated from the earliest stages of plan-making, with opportunities to promote active travel pursued both by local authorities and developers from the outset. It must signal to developers that high quality walking/cycling provision – whether new walking/cycling infrastructure and/or links to existing walking/cycling networks - is a top priority, to be delivered through new development. This approach is consistent with the Government's Local Transport Note 1/20 which requires better integration between 'planning' and 'transport planning', as is clear from Chapter 14 of LTN 1/20. This chapter - on 'integrating cycling with highway improvements and new developments' - confirms the importance of ensuring that cycle infrastructure requirements are embedded into local authority planning.

Furthermore, the Government must ensure that there is meaningful stakeholder and community engagement, and that appropriate safeguards are in place so that all those who submit representations during the plan-making process can continue to appear before an inspector and have the right to be heard.

We are concerned that the entire corpus of plan-making law in England is proposed to be replaced in order to streamline the planning process (White Paper para. 1.16). Section 20(6) of the Planning and Compulsory Planning Act 2004 must be retained, as it provides an important right for any person making representations and seeking to change a development plan document to be given the opportunity to appear before and be heard by the person carrying out the examination.

³ [Department for Transport, 2020, Gear Change: A bold vision for cycling and walking](#)

This allows people to make and justify/defend their case fully and to test the evidence of others in person. Retaining the right to appear in front of an inspector during the plan-making process is particularly important in circumstances where the principle of development cannot be revisited once a local plan is adopted – as is proposed for sites annotated in the local plan under the ‘Growth’ category which would have outline approval for development on adoption, for example.

In connection with proposal 8, the White Paper states that all those who submitted comments would have the right to be heard by the inspector, whether face to face, by video, phone or in writing, at the inspector’s discretion. We do not believe that giving inspectors a discretion as to what form an objector’s representations might take, including a possible telephone call, would lead to increased local democracy or meaningful engagement. This will not, as suggested in the White Paper, democratise the planning process at the plan-making stage. It would do the opposite.

We are also concerned with alternative proposals in the White Paper (1) to reform the existing examination process by removing the automatic ‘right to be heard’ entirely so that participants are invited to appear at hearings only at the discretion of the inspector (2.53) or (2) to remove the Examination stage, instead requiring Local Planning Authorities to undertake a process of self-assessment against set criteria and guidance (2.54).

We are strongly of the view that neither of these alternatives would provide the requisite public participation, independence or sufficient scrutiny as to whether plans meet the necessary legal and policy tests. It would lead to a significant loss of public trust in the plan-making process.

Proposals for streamlining the development management content of Local Plans

If Local Plans are to have a more focused role in identifying site and area specific requirements, alongside locally-produced design codes, with general development management policies set out in the revised NPPF, the Government must ensure that:

(1) The NPPF (and any accompanying PPGs) sets out a very clear, rules-based framework to ensure that new development is designed for people to walk and cycle because it is the most obvious, easiest and cheapest choice. In order to do this, national planning policy should include the following:

- Adopt the 20-Minute Neighbourhood concept as a central principle of the planning system, including both the NPPF and Local Plans, requiring everyday amenities such as schools, shops, recreation, green space and work to be within a 20-minute walk of homes; where streets have wide pavements, seating and cycle parking and people can use high quality, safe walking and cycling networks.
- Referring to and embedding the National Cycle Network within the NPPF as a UK-wide network of national importance. This would ensure consistency with the national planning policies of the devolved nations where, for example, planning authorities in Wales are required to seek to assist in the completion of the Network together with key links to and from the Network, through new development. Ensuring a consistent UK-wide approach in national planning policies is critical for national infrastructure assets such as the Network.

(2) The NPPF and new legislation must mandate that all new development to help meet the legally binding net-zero carbon targets set out in the Climate Change Act 2008. Climate

change is the most urgent environmental challenge that we face and transport has a significant role to play in reaching net-zero. As a suggested approach, we note that in order to combat biodiversity loss, the Government is developing proposals for biodiversity net gain. This is to be delivered within the existing planning and development process in England, with a mandatory 10% biodiversity net gain requirement for planning approval for all new developments in England as against the pre-development baseline position. A similar legal and planning mechanism should be introduced with regard to climate change targets, to help deliver net zero.

(3) Similarly, the NPPF and new legislation must mandate all new development to meet legally binding targets on air pollution. This could be achieved by a similar legal and planning mechanism to that noted above.

(4) Locally produced design codes must be designed by and for people, neighbourhoods and communities. It is not clear from the White Paper how design codes would be developed and approved, but this level of detail is necessary for us to be able to provide a detailed and informed response. From our experience of working with communities, on community-led street-design projects for example, we know how important it is to put communities' voices at the heart of how we design our streets and public spaces, in helping to tackle issues such as health inequality and community buy-in.

Proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”

If the Government is to replace existing legal and policy tests for Local Plans with a consolidated test of sustainable development, the definition of ‘sustainable development’ must demonstrate how it will meet our legal targets for climate change and to include high quality sustainable transport provision with a strong emphasis on walking and cycling and reducing demand for vehicle trips.

Achieving net-zero will require a reduction in vehicle use; electrification of the existing fleet alone will not be enough to achieve this⁴, as outlined below.

- The design and location of where people live has a large influence on how they travel and the planning system is well placed to help deliver our net-zero target.
- Accordingly, there should be a mandatory requirement for all new development to meet net-zero carbon targets (including the journeys they generate) to help ensure that our climate change obligations to bring all greenhouse gas emissions to net-zero by 2050 are met. As noted above, achieving net-zero emissions by 2050 is a legally binding target in section 1 of the Climate Change Act 2008 (as amended).
- The Government should make it clear, as part of the new rules-based approach, that in order to meet “sustainable development” criteria, Local Plans should follow the 20-Minute Neighbourhood principle and include the delivery of high quality and sustainable transport infrastructure that strongly encourages people to walk and cycle. At the same time, the road networks of new developments should be designed in a way which reduce the convenience and speed of making vehicle trips, to fundamentally reduce demand.

⁴ [Transport for Quality of Life, 2018, More Than Electric Cars](#)

Proposals for automatic permission in principle for areas for substantial developments

The White Paper states that the Government will legislate to require that a masterplan and site-specific code are agreed as a condition of the permission in principle which is granted through the local plan. It is not clear whether the masterplan and site-specific code would be agreed by the time of adoption of the local plan or could be agreed subsequently. This should be clarified.

Important details such as the provision and location of cycle parking can in our view be properly dealt with at a later consent stage. But the provision and location of on and off-site walking and cycling infrastructure in connection with large-scale new development (whether new infrastructure, improvements and/or connections to existing walking/cycling networks) are important spatial planning issues which must be considered at an early stage of the plan-making process, i.e. before local plans are adopted, to ensure greater clarity and certainty. It would also increase the likelihood of delivering and/or providing developer contributions to fund such infrastructure on land suitable for comprehensive development.

Similar considerations must be made for the number of car parking spaces per dwelling; limiting spaces or adopting a default car-free position for new developments would help to encourage people to use different forms of transport.

Sustrans carries out strategic cycle network planning on behalf of local authorities, which forms part of the evidence base for emerging Local Plans and strategic land allocations. An example is the Nuneaton & Bedworth Borough Council Local Plan (2011-2031), which directly references the strategic cycle network planning which we carried out, requiring new footpath and cycleway links to be enhanced and developed as part of new housing and mixed use allocations. Not all local authorities commission this type of work, however, and this is a missed opportunity. A reformed planning system should require strategic cycle network planning to be undertaken as part of the plan-making process for all emerging Local Plans.

Proposals to make decision-making faster and more certain?

We are concerned that pursuing the objective of making decision-making faster and more certain could be detrimental to local democracy.

The White Paper states that the entire corpus of plan-making law in England is to be replaced in order to streamline the planning process (White Paper para. 1.16). If this means that section 20(6) of the Planning and Compulsory Planning Act 2004 - which provides a legal right for a person making representations and seeking to change a development plan document to be given the opportunity to appear before and be heard by the person carrying out the examination - will be repealed, then we object strongly to this.

Section 20(6) is important because it allows people to make and justify their case fully and to test the evidence of others in person. Retaining the right to appear in front of an inspector is vital in circumstances where – as is proposed - the principle of development cannot be revisited once a local plan is adopted; where sites annotated in the local plan under the ‘Growth’ category have outline approval for development, for example.

The White Paper states that all those who submitted comments would have the right to be heard by the inspector, whether face to face, by video, phone or in writing, at the inspector’s discretion. We do not think that given inspectors a discretion as to what form an objector’s representations might take, including a possible telephone call, would lead to increased local

democracy or meaningful engagement. It will not, as suggested in the White Paper, democratise the planning process at the plan-making stage. It would do the opposite.

We are also concerned with alternative proposals in the White Paper (1) to reform the existing examination process in order to speed up the process by removing the automatic 'right to be heard' so that participants are invited to appear at hearings only at the discretion of the inspector (2.53) and (2) to remove the Examination stage entirely, instead requiring Local Planning Authorities to undertake a process of self-assessment against set criteria and guidance (2.54). Neither of these alternatives would provide the requisite public participation, independence or sufficient scrutiny as to whether plans meet the necessary legal and policy tests.

Proposals for a 30 - month statutory timescale for the production of Local Plans

It is clear that the current system takes too long and needs reform. Local plans are critical to manage and guide local spatial development, housing plans and urban renewal. Without a local plan there are more risks across development and unnecessary delays will exist within the planning process.

Sustrans therefore agrees that a faster and less onerous Local Plan process would be beneficial subject to appropriate safeguards. However, in doing so the Government must make sure the process and outcomes from developing a Local Plan are not rushed, that they are representative of the local communities' views and that local development is sustainable and aligns with housing goals, transport goals, affordability and the UK's target to reach net-zero by 2050.

Proposals for improving the production and use of design guides and codes?

The proposals for improving the production and use of design guides and codes is a positive step, and should also include stipulations around walking and cycling infrastructure.

This is reinforced in Chapter 14 of Local Transport Note 1/20 for larger schemes of development⁵. LTN 1/20 states that "design codes for new developments may be useful documents which establish the dimensions, layout and the materials palette for different types of route, **including walking and cycling-only links**. A design code will help ensure a consistent approach is taken across the site and at different phases of development where growth takes place over several years. Design codes are typically prepared by the development team and approved by the highway authority...**a cycle network plan should be included in the design code.....**"

The Nansledan Design Community Code⁶ in Cornwall is a good example of how to incorporate local heritage into a contemporary development. Under the Community Code, each quarter or neighbourhood of Nansledan has its own distinctive Design and Community Code, and unique emblem, inspired by the local flora.

However, community design guides and codes need to include traffic reduction measures.

Proposals to establish a new body to support design coding and building better places

⁵ [Department for Transport, 2020, Cycle infrastructure design \(LTN 1/20\)](#)

⁶ [Duchy of Cornwall, 2020, Nansledan Design and Community Code](#)

We agree with the proposals included in Q18, and believe that a chief officer for design and place-making could help to push back against developers who wish to build a development which yields the most profit, rather than building a development which is sustainable and beautiful, which works for residents and local people.

Currently, local authorities have insufficient resources to push back, so ensuring that an officer is in place could help to achieve this.

It is vital that the chief officer has the requisite expertise in sustainable place-making, to ensure that new developments have a holistic approach, marrying design coding with functional place-making; and incorporating high quality walking and cycling provision, i.e. streets which are sustainable and beautiful.

The Goldsmith Street social housing development in Norwich is a good example of where this has taken place. The development was the first social housing project to be awarded the Stirling architecture prize⁷.

⁷ [RIBA, 2019, Goldsmith Street](#)

Proposals to consider how design might be given greater emphasis in the strategic objectives for Homes England

Giving greater emphasis to design in the strategic objectives for Homes England could help to make developments and local communities more sustainable.

For example, many new developments, particularly flats and social housing, lack indoor and outdoor space to securely store cycles, which can be a barrier to cycle ownership and use. Providing such space and supporting more people to cycle can help to reduce vehicle trips locally and also broaden the travel horizons and opportunities of people who do not drive or find it difficult or not financially viable to use public transport.

Each residency in the Goldsmith Street development in Norwich, for example, features secure space to secure a cycle at ground floor level, a simple and cost effective solution introduced at design stage

Proposals to replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy

Sustrans is often involved in discussions with local planning authorities for developers to provide new walking and cycling infrastructure, including new traffic-free sections of the National Cycle Network, as part of new development. We agree that Section 106 negotiations between the local planning authority and the developer can sometimes lack transparency, particularly those based on the developer's assessment of viability, and that this can create uncertainty. We also recognise that the Government is seeking to reduce time spent negotiating agreements, discussing viability and inefficiencies in capturing land value uplift, but we have the following comments:

However, we are concerned that proposal 19 in the Planning White Paper is to "abolish" the current system of planning obligations and replace it with the new Infrastructure Levy. We hope that, if this reform is pursued, it will relate only to the way in which financial contributions are secured and that the Section 106 planning obligation will remain. We explain why below.

It is our experience that, as well as ensuring new walking and cycling paths are constructed, local authorities also need to secure, through a planning agreement with the owner of the land/developer, long term use of the paths by the public for cycling and their on-going maintenance. A section 106 obligation is a useful legal mechanism for achieving this because it runs with the land; is legally binding; and the obligations/covenants can be enforced by the local planning authorities against both the original parties to the agreement and any successors in title: the planning obligation becomes a land charge and is apparent to prospective purchasers before buying land.

We note that elsewhere in the White Paper it is recognised (but only in a footnote - fn18, p51), that a Section 106 obligation could still be used to secure a covenant on the land where necessary. We would support this. We also note that planning obligations are referred to in the forthcoming Environment Bill on Nature and Biodiversity: Clause 91(2)(c) and clause 91(9) refer to planning obligations within the meaning of the new schedule 7A of the TCPA 1990); it is clear from the draft Bill, therefore, that planning obligations are envisaged to continue (together with planning conditions and conservation covenants) in order to secure long-term habitat enhancement.

The White Paper states that the new Infrastructure Levy will be available for wider purposes than the Community Infrastructure Levy. If so, there is a danger that the funding would be

distributed over too many competing interests. To guard against this, and in recognition of the cross-cutting nature of sustainable transport, which has a significant role to play in creating healthy communities and in reaching net-zero and air pollution targets for example, the Government must ensure that funding for high quality walking and cycling infrastructure is ring-fenced within the Infrastructure Levy as a top priority for delivery.

The provision of on and off-site walking/cycling infrastructure by the developer should be off-set against the Levy, as is proposed for affordable housing. This would help to create an incentive for developers to build high quality walking/cycling infrastructure as part of new development, rather than an 'add on' at a later date.

Para. 4.12 of the White Paper states that in areas where land value uplift is insufficient to support significant levels of land value capture, some or all of the value generated by the development would be below the threshold, and so not subject to the Levy. The White Paper does not state, however, what would happen to the provision of infrastructure in locations where the Infrastructure Levy is not payable. The Government must avoid the prospect of lower investment in areas of low land value where value uplift will be insufficient to fund the required sustainable transport infrastructure. Consideration must be given as to how investment is still directed to these areas and a specific amount of funding should be ring-fenced for areas of lower land value.

Potential impact of proposals raised in the white paper on people with protected characteristics as defined in section 149 of the Equality Act 2010

Walking should be the most equal and inclusive form of travel but is too often overlooked by politicians, transport planners, and developers. Access to amenities, green space, education and employment allows people to live well, connect and participate in society.

Adoption of the 20-Minute Neighbourhood concept as a central principle of the planning system, including within both the NPPF and Local Plans would support our legal duties under the Equality Act 2010. Focusing on walking instead of driving would ensure mobility and access were far more inclusive, reduce societal inequalities and improve the lives of people across England. It is very important that, whilst seeking to speed up and streamline local plan processes, the legal duties set out in the Equality Act 2010, including in relation to spatial planning and the delivery of walking/cycling networks, are not bypassed or given insufficient consideration.

There is also a wider issue of equity. All urban design, including cycling design, has the potential either to perpetuate or reduce social inequity. Only by ensuring that voices of underrepresented groups are heard and integrated in policy, planning, design and implementation, can we create places that meet the needs of the diversity of people who want to use them. The planning system is well placed to help deliver this.

3. How can the planning system ensure that buildings are beautiful and fit for purpose?

The planning system has been failing to create beautiful and vibrant neighbourhoods or communities.

Planning for beautiful spaces must consider the reduction of motorised traffic as one of its key components, which cannot be achieved whilst most trips are driven.

Fundamentally, new developments continue to be built away from existing settlements and without their own amenities. This naturally means that trip distances cannot be made quickly and conveniently by walking or cycling, with residents locked into car dependency as soon as they move in.

Sustrans works in all regions in England (and the rest of the UK). In our experience, many new developments in England (and elsewhere) do not make it easy for people to walk, cycle and use public transport. By embedding car dependency through their location, design and function, new developments are typically neither beautiful nor sustainable.

New developments also tend to be built with several parking spaces per home, which encourages multiple car ownership and driving. New developments lack pavements to connect with other places and/or fail to provide pedestrian shortcuts (permeability), meaning that walking is long and unattractive compared to a car journey. Buses, while sometimes subsidised when construction is first complete, can be removed if operators don't consider a development to be financially viable. In new social housing developments, particularly, there is little or no space to securely store a cycle.

By failing to make it easy to travel without a car, many new developments are intrinsically not sustainable, even if they benefit from positive aspects of construction such as energy efficient homes. As noted above, the definition of 'sustainable development' must include high quality sustainable transport provision with a strong emphasis on walking and cycling. There should be no 'trade off' between walking and cycling provision and other sustainable measures as part of new developments.

Proposals for implementing a fast-track for beauty

The principle of 'fast-tracking proposals which comply with pre-established principles of what good design looks like' could be beneficial, but only when these are sustainable, permeable for walking and cycling, clearly defined, set locally, supported by the local community and adhere to strict standards for building, street and neighbourhood design.

These codes should include ensuring genuinely affordable housing is present in all schemes. It is also imperative that development aligns to ensure that the Government's plan to achieve net-zero by 2050 is met, and applies not just to the fabric of buildings but also the arrangement of streets, neighbourhoods and local amenities.

Model codes can be informed by national standards, including for place-making, that deliver high quality walking and cycling routes, but they must be developed locally and enable local residents to be engaged through their development. Codes have been used successfully through developments like Nansledan in Cornwall⁸ for building design. However, we do not believe current codes strong enough to create neighbourhoods for people to socialise, play

⁸ <https://nansledan.com/living-working/living/design-community-code/>

and live whilst reducing the dominance of motor vehicles within housing developments and wider car dependency.

Good examples of developments that reduce or restrict car use and create people-centred streets, public spaces and neighbourhoods overseas include:

- **Houten, Utrecht, Netherlands**⁹, a neighbourhood designed to reduce short vehicle trips and facilitate walking, cycling and public transport use.
- **Vauban, Freiburg, Germany**¹⁰, a district planned around sustainable transport.
- **Hammarby Sjöstad, Stockholm, Sweden**¹¹, a former industrial area, now a series of eco-friendly urban developments.

Similar developments are starting to be built in the UK (see below). If a ‘fast track for beauty’ is introduced it should be developed to deliver only truly successful schemes such as those described below and seek to scale-up and improve upon existing best practice that is clearly described and explained.

Examples we are aware of include:

- Eddington, Cambridge¹², a new sustainable community close to the city centre.
- The aforementioned Goldsmith Street in Norwich¹³.

The newly proposed scheme in York to develop Britain’s biggest zero-carbon housing project of 600 homes¹⁴.

In the York scheme, cars will be parked at the edge of the sites, so streets can be devoted entirely to people and play spaces. Generous green “ginnels”, or passages between houses, will run between the rows of homes and around the edges of the developments, providing communal areas to garden, sit together and grow food.

These will also create permeable shortcuts to encourage people to get around on foot. And every house will come with at least one bike shed, fitted with electric charging points, while a fleet of shared cargo bikes will be available to rent.

5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?

Sustrans believes that involving local communities through a collaborative design approach is essential to deliver successful schemes. Local people are experts on their streets and years of travelling through their neighbourhood by foot, by bike or by car results in a deep awareness of the issues and innovative solutions for them. Gaining input from the community early on provides access to in-depth local knowledge and can save on monitoring, traffic count and modelling costs upfront.

The neighbourhood planning process should be developed to meet three simple rules:

⁹ [ITDP Europe, Case Study: Houten, Utrecht](#)

¹⁰ [Smart Cities Dive, 2020, The World's Most Successful Model for Sustainable Urban Development?](#)

¹¹ [The Nature of Cities, 2014, Hammarby Sjöstad — A New Generation of Sustainable Urban Eco-Districts](#)

¹² [Eddington Cambridge, 2020, About Eddington](#)

¹³ [RIBA, 2019, Goldsmith Street](#)

¹⁴ [York City Council, 2020, UK's largest zero carbon development plans submitted for consent](#)

- Provide opportunities for engagement and ensure they are accessible, comfortable and inclusive so everyone from the community can take part if they choose to.
- Listen to the local community and make sure they know their voice has been heard by feeding back our findings to them afterwards.
- Bring ideas to life through innovative street trials, enabling people to see and feel the change on foot, by bike or by car and then refine the changes before being made permanent.

An example of our successful planning and design approach is a two-year project we delivered in the culturally diverse residential community of Marks Gate in East London to improve local streets.

The project combined community-led street design, behaviour change and infrastructure improvements to increase opportunities for walking and cycling whilst creating a lively and more people-centred environment, and won the 2018 London Transport Awards in the Excellence in Cycling and Walking category.

We also agree with the proposals for digitised, web-based Local Plans, which are easily searchable and accessible online.

However, digital materials are not accessible to all communities and we would stress that publically accessible hard copies should also be available as a matter of course to ensure that everyone who wants to do so can be included in the process.

7. What changes, if any, are needed to the green belt?

Sustrans believes our focus for new homes should be within or adjoining existing settlements where there is already greater proximity to destinations and amenities, public transport links and walking and cycling infrastructure.

We are not aware of any evidence to suggest that ‘new settlements’ away from existing urban areas can be sustainable from a transport perspective. New settlements, or garden towns or new towns as they have been known over the years, are a convenient way of avoiding potential opposition from existing residents towards urban extensions and needing to extend into the greenbelt.

New settlements will only serve to increase car dependency and use by residents. An influential [recent report](#) suggested Government plans to develop 50 ‘Garden Villages’ and ‘Garden Towns’ across England will result in 200,000 households becoming car-dependent¹⁵.

This report reviewed 20 proposals for Garden settlement and found that:

- Only one settlement (Aylesham) offers amenities and a railway station within 1 mile of every home, though the train service is infrequent and there are no safe cycle routes to access it.
- None of the 20 settlements will provide bus services to all households all day, all week.
- Cycle routes from Garden Villages into nearby towns will often be long and dangerous.

¹⁵ [Transport for New Homes, 2020, garden village dream or tarmac estate?](#)

- Residents will have to walk up to 7 miles to access a railway station or go to the shops.

It is our strong view, therefore, that there is no case for allowing new settlements to be brought forward, whether under the Nationally Significant Infrastructure Projects regime or by way of any other legal and planning mechanism.

8. What progress has been made since the Committee's 2018 report on capturing land value and how might the proposals improve outcomes? What further steps might also be needed?

We would support a stronger emphasis on the build out of sustainable developments which are designed to be 20-minute neighbourhoods including high quality walking and cycling provision and measures to reduce car use. This would discourage developers from "sitting on" land and delaying sustainable development in order drive up its value.

In terms of further measures, Sustrans would like to see fairer land value capture and would support local authorities being given more power to unlock local sites for sustainable development through lower land value costs and making it easier to buy brownfield sites.

Currently, when local government buys land, it pays what the land would be worth if developed into a settlement, rather than its cheaper, existing value as an undeveloped site. If local authorities could purchase the land at its existing, undeveloped value, they could use the uplift in value once it is developed to spend on infrastructure which would make the developments more liveable. This would include provision such as cycling and walking infrastructure, public transport and green spaces.

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