



Consultation response

to

**Proposed reforms to the National
Planning Policy Framework and other
changes to the planning system**

March 2026

2. Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

partly agree

The new format and structure represent a very welcome and significant improvement. It would be easier to navigate if the contents page listed the abbreviations (e.g. PM) for each section and easier to refer to if sub-paragraphs were numbered such as PM1.2.3, for instance.

While we appreciate this is harder for a draft, there is insufficient integration of policies and in many places it is difficult to understand the relationships between them. The final version of the Framework would benefit from better integration of policies, such as through more cross-referencing and perhaps use of diagrams. For instance, the issue of parking (TR2) is relevant to efficient use of land, well-designed places, sustainable drainage etc. and should be mentioned in those other policies.

3. Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

partly disagree

We agree with the set but disagree with some of the definitions. In particular, the definition of sustainable transport modes, which should return to the pre-2012 definition focusing on walking, cycling and public transport while excluding low emission cars and vans. That is because it is wrong to reduce sustainability down to simply tailpipe emissions, while the definition risks becoming meaningless with the ban on sale of vehicles with traditional engines.

5. Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

partly agree

6. Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

partly disagree

There are three ways in which policy PM1 ought to be improved.

First, by focusing on how an area should change, the draft policy risks overplaying the agency a strategic authority has in an era of geopolitical tension, breakneck technological change and accelerating climate breakdown. A more realistic approach to manage uncertainty and environmental constraints, such as increasingly extreme weather, would be appropriate, especially given the twenty year timescale. In other words a policy that balances planning for uncertainty with a positive vision.

Second, the provisions of the Planning and Infrastructure Act 2025 which create these strategies require “reasoned justification”. Setting out and testing a genuine range of reasonable alternatives is surely foundational for this, as well as building public understanding and consent. Unprecedented levels of uncertainty require a different approach, indeed if circumstances change, a previously unfavoured alternative might be possible to take up, to reduce the time needed for a review.

Finally, the approach to transport is inadequate, placing consideration of it down the list. While other infrastructure like energy and water is essential for housing, those other types do not influence the scale, design and layout of developments. Transport should be brought forward from PM2.1.f to b so that it is considered at the earliest stages, in order to ensure the fullest possible use of sustainable modes and to minimise land take and pollution.

Integration with local transport plans should not only consider strategic infrastructure but also integration with key policies, such as the approach to parking, to ensure local plans take a coordinated rather than competing approach to it.

7. Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?

partly disagree

PM1 2.i.ii rightly requires a review where there are significant changes to infrastructure, such as schemes being approved, delayed or cancelled. Significant changes to infrastructure management as well as infrastructure construction may be relevant too. The introduction of congestion charging or workplace parking levies could enable greater housing delivery, by making more efficient use of the road network and unlocking funding for better sustainable travel options. PM1 should therefore also reference significant changes to policies and proposals in the applicable local transport plan.

9. Do you agree with the role, purpose and content of local plans set out in policy PM2?

partly disagree

By focusing on how an area should change, the draft policy risks overplaying the agency a local planning authority has in an era of geopolitical tension, breakneck technological change and accelerating climate breakdown. A more realistic approach to manage uncertainty

Before its abolition in 2012, PPG13 made explicit reference to integration of local plans with local transport plans. A similar reference here would help ensure better integration of transport and development. Standards like PAS2080:2023 on carbon management in the built environment make this particularly important, since the need for (and cost of) infrastructure can be reduced through better management of infrastructure. In other words, better integration can reduce the costs of development and help unlock more affordable homes faster at less environmental cost.

10. Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?

Yes

11. Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

partly disagree

While we agree in principle to an extent, the risk is that once this policy is embedded, it will be too easy for national government to add new national decision-making policies, thereby salami-slicing local discretion and accountability.

13. Do you agree with the approach to the preparation of plan evidence set out in policy PM8?

partly disagree

The focus on baseline evidence is increasingly problematic in an era of accelerating change and unprecedented uncertainty. It also does not sit easily with proposals for a vision-led approach such as in transport.

Regarding the former, when the [Environment Agency published a major update to national flood and coastal erosion risk assessment](#) in 2024, that was based on a 2018 climate model, meaning the forecasts seriously underestimated risk even before they were published. A fundamentally different approach is required for dealing with topics where there is such uncertainty or change.

In terms of vision-led approaches to transport, while all 2022 National Road Traffic Projections suggest increasing traffic, two of the four scenarios published by the Government Office for Science in its 2050 Net Zero Society report suggested decreased traffic. In this context, PM8 appears to brush under the carpet many fundamental challenges to plan-preparation.

14. Do you agree with the approach to identifying land for development in PM9?

strongly disagree

Connectivity, including capacity of sustainable transport modes, should be explicitly mentioned. The connectivity tool provides a start but would require enhancements to consider factors such as capacity, conditions (for active travel), and viability of upgrades.

We suggest adding the following new sub-paragraph:

“An assessment of the connectivity and capacity of transport infrastructure, including potential for improving making more efficient use of highways and upgrading infrastructure for sustainable transport modes.”

15. Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?

strongly disagree

The policy in the NPPF, in particular as to vision-led transport, is far too vague and ineffective to enable adequate cooperation. With transport issues often being greater than the proposed scale of spatial development strategies, and different political parties' views differing more than other policy areas, this is likely to become a major problem.

The question of "where additional infrastructure is needed" may depend on transport policies, such as parking controls and congestion charging, and the degree to which a PAS2080 compliant approach is adopted in individual authorities. Further policy as well as guidance is urgently needed.

A difficulty with the connectivity tool as it stands is that it only sets out existing levels of connectivity. While public and private bodies can use it to model different assumptions on how transport networks might improve, there is no data layer for committed and potential transport schemes. In London PTAL was modelled for a future year as well as the current one. So there is a need to agree data at a regional level of committed and potential transport schemes, in order to enable effective cooperation.

18. Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?

strongly disagree

Two amendments are needed. First, the word "provision" should be removed as some standards may need to relate to infrastructure "levels of service", which can be achieved through policies as well as provision.

Levels of environmental pollution should also be expressly allowed. The shift in the Environment Act 2021 to population exposure levels for some air quality standards means that in some busy areas, specific local standards adapted from national ones may be justified.

19. Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?

strongly disagree

A new test of "adaptable" is needed for both policies, to enable the planning system to manage increasing uncertainty and to ensure strategies and plans can be more resilient in the longer term.

As explained in the answer below to question 20, more detail is needed on reasonable alternatives.

20. Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

As explained in earlier answers, the creation and testing of reasonable alternatives is crucial to robust and credible plan-making, especially in an era of escalating uncertainty, yet these are only namechecked in PM14 and PM15. With the Government indicating that it plans to proceed with the system of Environmental Outcome Reports, further detail and guidance is urgently required. All the more so as very little has been said how that system might replace Strategic Environmental Assessment, compared to Environmental Impact Reports.

34. Do you agree with the proposed approach to setting a spatial strategy in development plans? *strongly disagree*

The spatial strategy ought to be explicitly public transport oriented, prioritising compact, mixed-use development around public transport nodes. The strategy should include consideration of the connectivity and relationships between such nodes. This approach is key to increasing agglomeration benefits, making efficient use of land and managing congestion.

35. Do you agree with the proposed definition of settlements in the glossary?

strongly disagree

The definition is too vague and would enable edge-of-town development. If a site is not part of the build-up area already, the definition, hence the presumption of development, should not apply.

36. Do you agree with the revised approach to the presumption in favour of sustainable development?

strongly disagree

This is a presumption in favour of development because the sustainability requirements are so weak.

Even the impact assessment for the then Planning and Infrastructure Bill noted evidence that the “*latest independent audit of housing schemes of 142 developments across England (Place Alliance, 2020) found that new housing design is still overwhelmingly ‘mediocre’ or ‘poor’, and many schemes should have been refused planning permission*”.

Despite recent evidence that the rate of climate change has doubled since 2015, the presumption gives minimal weight to climate issues, let alone other environmental constraints. A different approach is needed to make better use of limited resources, whether carbon budgets, land, the construction workforce or public funding.

37. Do you agree to the proposed approach to development within settlements?

strongly disagree

The proposed approach would make it very difficult to refuse any development within settlements on transport or design grounds, essentially only where a proposal impacted on land safeguarded or allocated for a transport purpose. That is because no transport or design policy is either explicitly listed in S4 2 a ii or pursuant to S4 2 c states that development should be refused in specific circumstances, something that TR6 3 taken at its highest does do. As noted in the answer to question 36, independent analysis has confirmed that much new development should have been refused planning permission, so this policy taken as a whole would have a catastrophic impact on already poor standards.

38. Do you agree to the proposed approach to development outside settlements?

partly disagree

As with the previous answer, the policy (here S5 2) should be strengthened to widen potential policies that could be used for refusal to include transport and design.

It would be better to use the connectivity tool to assess connectivity to rail stations, though additional policy would be needed to ensure conditions were suitable for walking at all times of day and night.

39. Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

partly disagree

The wording in policy S5 4 listing “promoting sustainable patterns of movement” as an exception requires more detail and ambition, not least as the glossary currently defines sustainable transport modes as including low emission cars. It could instead say “critical to unlocking more use of sustainable transport modes”.

40. Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

partly disagree

It would be better to use the connectivity tool, combined with approaches that consider the attractiveness of walking and cycling conditions at all times of day.

42. Do you agree with the approach to planning for climate change in policy CC1?

strongly disagree

While the sentiment of addressing net zero is welcome, the policy is seriously inadequate for multiple reasons. To improve clarity, it would be better to split CC1 into separately numbered policies for mitigation and adaptation.

Regarding mitigation, the approach should follow the IEMA (now ISEP) guidance on assessing Greenhouse Gas Emissions. The policy should switch from “can help contribute to radical reductions” to “contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050” (in line with that guidance).

PAS2080:2023 on carbon management in the built environment should be referenced too. With nearly half of emissions being extraterritorial, and these likely to be the majority by the late 2030s, defining scope will be crucial too. Compact form helps reduce embodied emissions, also known as capital carbon, in building material for instance.

43. Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

strongly disagree

While we welcome the intent behind the policy referring to a genuine choice of sustainable transport modes, this policy has not proved effective in practice. So it would be better to refer to the connectivity tool, including setting what quantified levels of connectivity might represent a genuine choice.

Explicit reference to the need to reduce embodied emissions is required too, such as through more compact form and shared transport options to enable reduced levels of car ownership. Explicit mention of adaptability, whether of building or street layouts, is needed to help enable future re-use.

44. Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

partly disagree

Avoiding soil sealing, rather than simply mitigating water runoff, should be set out in line with recent EU legislation, see comments on policy F8 below.

The collapse of the Atlantic Meridional Overturning Circulation, which would cause drops in UK winter temperature, is no longer a trivial risk for the lifetime of developments now being consented and therefore needs to be explicitly considered in planning.

48. Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

partly disagree

The policy is currently “transport blind”, despite major infrastructure such as the Elizabeth Line having a transformative effect on housing markets. The policy therefore should be amended to include consideration how major public transport upgrades might transform housing markets.

55. Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

partly disagree

The current wording for “good access” in HO4 is too vague. Specific - and significant - ambition is needed on sustainable travel outcomes, in order to achieve lower car parking provision and boost the business case for good quality public transport. At the very least exemplary levels of active travel (55%+) should be the ambition for these sites, not least as they have potential to catalyse increases in physical activity in the surrounding area.

62. Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Yes.

There is a surplus of permissions for sprawling detached homes that remain unbuilt, yet a shortage of more affordable homes, such as those at gentle density. Just like automotive manufacturers have focused on larger and more profitable SUV type vehicles, so housing developments have focused on larger homes. With home and car sales stalling, the model of relying on market signals is failing in both sectors. While the Government’s ambition for much higher growth is duly noted, growth forecasts have been repeatedly cut back as geopolitical and other challenges mount.

82. Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

Yes

Very large sites should be planned to achieve exemplary sustainable travel outcomes, such as at least 55% modal share for walking and cycling, the UK’s national deployment assumption for 2035, and public transport levels close to outer London levels. This not only would minimise the land take but also catalyse wider benefits around the surrounding area. This includes reducing long term NHS costs and avoiding the need to expensively retrofit public transport and active travel infrastructure in the future.

84. Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

strongly disagree

There should be greater focus on economic resilience, including referring to it in the title of policy E1. Currently it is only mentioned at the end, despite recent events in the Middle East illustrating how businesses and communities are increasingly being buffeted by global instability.

Policy E1 1 c ii should explicitly refer to modal shift and increased occupancy not simply “transport innovation and decarbonisation” since behaviour change is even more important for freight decarbonisation given the slow pace of its electrification. This could be also achieved by defining sustainable freight in this way in the glossary and referring back to it here.

85. Do you agree with the approach to meeting the need for business land and premises in policy E2?

strongly disagree

The proposed policy would give “substantial” weight to any commercial development, including freight and logistics proposals, which in practice would mean sustainability considerations would have minimal if any weight in practice. That would be the case even if the economic case for a development was fanciful.

Policy E2 1.a should refer to “sustainable” freight and logistics – which should have a definition in the glossary, as the reference to current “sustainable transport modes” definition is better focused on the movement of people. The policy in 2b iii should explicitly refer to the circular economy as this is an important element of the Environment Act 2021 and an opportunity for dynamic business growth.

86. Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

strongly disagree

There are two reasons the policy needs improving. First, many freight issues will be larger than local, or indeed larger than SDSs. Additional policy or guidance is needed to assess need across plans and strategies.

Second, the proposed policy would not be effective in securing the fullest possible use of sustainable modes (or even defining them in the context of freight) or securing other benefits such as increased loading of vehicles, an important issue with nearly a third of UK HGVs running empty.

1 a should state an explicit presumption for the largest sites to be rail connected.

1b should promote consolidation of loads, which is different to co-location. This can be especially important in reducing impacts in denser urban areas.

1 c should ensure provision of charging facilities for lorries.

Finally a new policy is needed to support the roll out of parcel lockers, in particular where they are co-located with sustainable travel stops and shared vehicles.

89. Do you agree with the proposed changes to policy for planning for town centres?

strongly disagree.

We disagree with the removal of what is currently NPPF paragraph 95, which needs to be kept to ensure that failure to comply with policy is given significant weight against approving a development.

91. Do you believe the sequential test in policy TC3 should be retained?

partly agree

The test should be retained but in order to be effective, it also requires the existing policy in paragraph 95 of the NPPF to require refusal where the test is not met.

93. Do you agree with the approach to town centre impact assessments in policy TC4?

strongly disagree

The existing policy in paragraph 95 of the NPPF, which requires refusal where there are significant adverse effects should be retained, otherwise TC4 would be weak and ineffective in practice.

114. Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

partly disagree

115. If not, what further guidance is needed?

The policy is generally very good, what it lacks is any linkage to reducing the amount of land wasted on car parking and highways sized for car intensive development, which can make up as much as a third of the area of some developments. This policy ought to highlight the need to minimise space for car travel and link through to a stronger policy on parking.

Days before the NPPF consultation commenced, the EU confirmed legislation to address this issue. England, as a particularly densely populated nation, needs a similar approach in the NPPF, if not legislation too. With our country increasingly dependent on foreign food, one of the most nature depleted countries in the world, and land being lost to erosion and climate change, making more efficient use of land is fundamental to any definition of sustainable development. What is missing is both a hierarchy (e.g. reduce landtake, mitigate impact, compensate) as well as some aspirational targets. The following paragraph should be added:

“Set out standards and monitoring of net land take, including proposals to secure no net increase by 2040”.

In addition the EU legislation should be incorporated:

“(a) avoiding or reducing as much as possible the loss of the capacity of the soil to provide multiple ecosystem services, including food production, by:

(i) reducing, as much as possible, the area of soil affected by soil sealing and soil removal, in particular by encouraging the reuse and repurposing of sealed soils, such as existing buildings;

(ii) selecting areas where the loss of ecosystem services would be minimal, in particular areas with severely degraded soils, such as brownfields; and

(iii) carrying out the soil sealing and soil removal in a way that minimises the negative impact on soil, in particular by protecting the surrounding soils or by keeping the soil sealing as reversible as possible;

(b) aiming to offset to a reasonable extent the loss of the capacity of the soil to provide multiple ecosystem services, including through returning ecosystem services by encouraging the de-sealing of sealed soils and the reconstruction of areas that underwent soil removal.”

https://environment.ec.europa.eu/news/first-eu-law-soil-set-enter-force-2025-12-05_en

121. Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

partly disagree

Continental best practice can require up to 100 dwellings per hectare by well connected stations so these levels should be an absolute minimum, to avoid being seen as a standard. The policy should explicitly reference the need to avoid wasting space on car parking and highways near stations.

122. Do you agree with the minimum density requirements set out within policy L3?

partly disagree

Higher densities may be appropriate in many of these locations, such as through carfree development. But need to be planned alongside sustainable travel improvements, such as in LTPs.

124. Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station?

strongly disagree

It would be better to start with the connectivity tool and seek to iterate it by including future rail ambitions. With an increasing share of the population that is retired, and uncertain changes to working practices in future, an approach that considered non-commuting journeys too would be more appropriate. In addition, Great British Railways should be encouraged to provide a national dataset of future rail upgrades - both funded and wider ambitions - to use in planning.

125. Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? Yes

Urban cores and other locations with high current or proposed connectivity scores.

126. Should we define a specific range of residential densities for land around stations classified as 'well-connected'?

Yes

Though a floor should be set out, rather than a range since that implies a ceiling.

133. Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

neither agree nor disagree

We support the principle of denser development around suitable stations, however further policy is required to ensure that this does not come at the cost of making it harder to integrate and expand sustainable transport infrastructure next to stations, whether more bus stops, cycle parking, shared transport, or active travel routes with space to cater for major growth in future. There are examples of poorly planned proposals, such as next to Redhill station.

Development that does come forward should be required to contribute to better continuous active travel routes beyond the red line of the site. Just placing car-based developments near railway stations, which is a real risk under existing policy, will not lead to modal shift and a significant increase in rail revenue, while risking overloading the local road network at a critical node for integrating sustainable transport modes.

139. Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

strongly disagree

The Golden Rules are very weak on transport and require changing in two ways.

First, in relation to what might be "necessary infrastructure", the sustainability hierarchy in PAS2080 should be explicitly considered and its sustainability hierarchy applied of build nothing, build less, build smart.

Second, high quality standards should be required for active travel modal share and its infrastructure, maximising opportunities to walk and cycle through and along green and blue infrastructure to provide public benefit as compensation for the loss of Green Belt. This goes beyond the current proposal of access to green space by enabling people to incorporate nature in their daily travel.

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

strongly disagree

In 2019, the Building Better, Building Beautiful Commission found that “Every sector of the industry has told us, and our wider research has firmly agreed, that overly car-dominated places tend to be less attractive or popular.” It concluded “we have to seriously tackle car dominance when designing places”.

Yet the proposed policy skirts around this clear finding, saying nothing about avoiding the dominance of motor traffic or parking. New wording should be added as follows:

“Ensuring that areas and developments are not dominated by motor traffic and parking, by carefully applying policies in the design and transport chapters and monitoring outcomes.”

148. Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

partly disagree

As explained in the answer to question 146, clear policy is needed to avoid creating car dominated places. The current wording to “prioritise walking, wheeling, cycling and public transport” has the right sentiment but time and time again proves utterly ineffective in practice.

“Movement: provide transport infrastructure and manage public space to secure high levels of sustainable transport modes, in particular active travel, and to avoid car dominance.”

In terms of public space, the presumption of designing roads for motor vehicles then planning some pedestrian and cycle routes around it, the starting point should be that, where they are allowed, motor vehicles are guests in space for people. A limited network of through routes for motor vehicles should be provided, ensuring that active travel is the most convenient form of movement for the majority of journeys.

149. Do you agree with the proposed approach to using design review and other design processes in policy DP4?

Strongly agree

150. Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?

strongly disagree

Nearly two years after the vision-led approach to transport was first set out, it remains meaningless in practice. This was vividly illustrated by National Highways publishing [vision-led guidance](#) during the consultation period that promotes traffic flow on its strategic

road network. The relationship with DfT's ever more outdated National Road Traffic Projections requires clarification too.

The latest attempt in policy TR1 is no clearer, with sub-paragraph a containing too many factors to be likely to be followed well. An approach which considers a wider range of sustainable options tied to outcomes is needed, one that seeks to improve connectivity and reduce car dominance as well as dependence.

Though the reference to Local Cycling and Walking Infrastructure Plans is welcome, the current 2017 guidance needs to be updated as these are set out over too short a timescale to be able to integrate well with plan-making.

Greater detail is needed on how to use the connectivity tool, whether in relation to acceptable levels of connectivity now, or how to plan and assess the cumulative impact of new infrastructure and policies.

Finally as noted above, the definition of sustainable transport modes in the glossary should be restored to its pre-2012 version by removing reference to low emission vehicles.

151. Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?

partly disagree

While we strongly support the changes to enable and encourage maximum parking standards, there should be a strong presumption in favour of such standards everywhere, in order to make the fullest possible use of sustainable transport and efficient use of land. This is particularly important given the need to avoid sealing soil for parking and highway infrastructure.

Before it was replaced by the NPPF in 2012, PPG13 took a far more ambitious approach to parking, setting national maximum standards and promoting carfree developments. The fact that this draft NPPF does not bring back that ambition is deeply disappointing and needs to be urgently remedied. This would unlock higher densities, lower emissions, healthier places and more affordable homes. The importance of ambitious parking policy should be cross-referenced through the NPPF.

There should be an explicit policy here requiring the setting of cycle parking standards, including making provision for shared micromobility so that there is future proofing.

152. Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?

strongly disagree

The policy needs to be reworded to say that development generating significant movement must be situated in locations that are or can be made sustainable and that failure to comply

with this is a reason for refusal. An exemption should be made for essential freight uses, subject to the changes to the freight policy suggested above.

The policy to “take into account” environment impacts risks being meaningless in practice and contrary to the revised Environmental Improvement Plan. Both disproportionate impacts and those where an environmental limit risks being exceeded should be an explicit reason for refusal.

The wording to improve sustainable travel options “where they exist” in rural areas is unclear and inadequate, as creating new options may be appropriate in some locations.

153. Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?

strongly disagree

Because this policy does not state that development proposals should be refused in relation to any aspect of it, it would have very little weight against the presumption of sustainable development. In other words it is far from a sufficient basis to integrate transport considerations. This needs to change. Linkages should be made here explicitly to other policies, such as on design, healthy communities and freight.

Rather than referring to specific facilities, there should be explicit reference to compliance with LTN 1/20 and any equivalent guidance for walking. Care should be taken to ensure that provision is made for adequate space for growth in walking and cycling for the lifetime of the development.

The arrangement of streets should not necessarily be attractive for driving, as in many instances it will be necessary to make active travel comparatively more attractive to secure modal shift.

The policy to provide a “suitable number of parking spaces” is very inappropriate: as explained regarding TR2, there should be explicit support for carfree developments, such as around stations.

154. Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?

strongly disagree

This policy is inadequate due to the lack of guidance as to both need and location, especially to manage decisions about in which authorities’ area a facility is most appropriately located. If driverless vehicles look like they may succeed, need may become harder to evidence.

155. Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?

strongly disagree

The policy needs to make significant adverse impacts an explicit reason for refusal. That should be possible in relation to the vision for the plan or indeed a specific area in it, not simply the vision for a site. Similarly in relation to the Local Transport Plan, in order that spatial and transport planning are integrated.

With progress in achieving safer roads in the UK largely flat lining, and many people discouraged from cycling due to perceptions of road danger, the test of “unacceptable impact on highway safety” is extremely inappropriate. It compares very poorly indeed with the wording in PPG13 pre-2012 that planned positively to actively improve road safety. The Road Safety Strategy published in January committed to ambitious targets for 2035 and a safe systems approach. Even more ambitious reductions in road danger should be planned for during the lifetime of new developments. This in turn requires TR6 to require development proposals to align with for vision zero, and far higher rates of active travel.

156. Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?

strongly disagree

TR7 1d is seriously inadequate and needs to be changed to consider cumulative impacts as well as making significant environmental impacts an explicit ground for refusal. In addition there is no mention of impacts on nature, which is a concerning omission.

157. Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

partly disagree

We strongly welcome the greatly improved policy. It would benefit from an explicit reference to Rights of Way Improvement Plans and Local Cycling and Walking Investment Plans, in order that these are given weight when deciding what maintenance and improvements development proposals might reasonably be expected to contribute to.

In most instances, designation as cycle tracks would be more appropriate than unsurfaced paths forming new rights of way, whether in terms of greater equalities, accessibility or all season suitability. It is only due to a historical anomaly that cycle tracks are covered by separate legislation. The title of TR8 should therefore be changed to “public rights of way and cycle tracks”.

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

strongly disagree

With national data released during the consultation period showing a staggering decline in healthy life expectancy, this policy is clearly far too weak and it is concerning that it seeks to water down current policy.

[Healthy life expectancy. UK: between 2011 to 2013 and 2022 to 2024](#) ONS (2026)

Radical action is needed to design in high levels of active travel and design out high traffic in new developments, and use development to catalyse similar change in existing, surrounding developments to reduce pressures on the NHS. Even low exhaust emission vehicles like electric cars cause significant noise, air and water pollution (through particulates), severance etc. In addition shops and some other facilities in high traffic neighbourhoods are less resilient because many residents can drive elsewhere, creating a vicious cycle of decline of community facilities. We therefore suggest amending HC1 1.e to read:

“...including through policies for strengthening town centres, locating and designing development so that high levels of ~~where it will support~~ walking and cycling are secured, and promoting mixed-use developments.”

More broadly, this policy should retain existing language about the need to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs” nor reference to “opportunities for meetings between people who might not otherwise come into contact with each other”. The latter point seems even more timely in light of the social cohesion strategy published by MHCLG in the final week of this consultation.

160. Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

strongly disagree

It is difficult to see how these policies would have much weight in practice, given the strength of the presumption of development and the fact that this policy is not explicitly listed in S4 2.a.ii, nor do policies HC3 and HC4 say non-compliant developments should be refused.

162. Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

strongly disagree

As with the answer to question 160 on HC3 and 4, because policy HC6 does not state that non-compliance is a ground for refusal, it would be unlikely to have much impact in practice. Given the importance of local facilities in themselves, and for fostering strong communities with high rates of active travel, we disagree with such a weak policy.

163. Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision?

strongly disagree

The proposed and/or wording would weaken the policy unacceptably, for instance enabling a better quality but far smaller replacement to be deemed acceptable.

164. Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

Strongly agree

174. Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?

partly disagree

With extreme rainfall increasing greater than climate models were predicting, there is an ever greater need for the policy to avoid creating new impacts rather than simply mitigate them. As noted in [CHECK], EU policy for soil now includes a sustainability hierarchy of reduce, mitigate, compensate. A similar approach is needed for this policy. That could be achieved by minimising surface area given over to car parking and roads in new developments, then SuDS as mitigation, with compensation involving reducing soil sealing in surrounding areas, such as by turning car parking spaces on surrounding streets into SuDS and tree pits.

179. Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

partly disagree

While we support the policy text it lacks any consideration of the need to minimise land take and soil sealing. Although this has been mentioned in relation to efficient use of land policies, it is very relevant here too.

181. Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

partly disagree

Policy is needed to avoid increasing motor traffic in recognised sites, and to take opportunities to reduce it. Higher levels of motor traffic cause a significant range of impacts, such as disturbance, mortality and deposition of pollutants, including microplastics in air and water from tyre wear. Reducing motor traffic and its impacts on ecological corridors between sites is therefore vital for nature recovery.

182. Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?

partly disagree

Policy is needed to avoid increasing motor traffic in protected landscapes, and to take opportunities to reduce it, while improving access. These landscapes are negatively affected by air, water, visual and in particular noise pollution from traffic, hindering public enjoyment of their special qualities such as tranquillity.

183. Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

partly disagree

Policy is needed to avoid increasing motor traffic in recognised sites, and to take opportunities to reduce it. Higher levels of motor traffic cause a significant range of impacts, such as disturbance, mortality and deposition of pollutants, including microplastics in air and water from tyre wear.

188. Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?

partly disagree

The impacts of motor traffic, such as visual (including signing and lining of nearby highways, as well as the vehicles themselves) and noise pollution, can be considerable on the appreciation of heritage assets, so they should be considered and reduced where possible.

190. Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?

partly disagree

An additional policy is needed to reduce the impact of motor traffic, including parking, on heritage assets, in particular conservation areas. Improving access through sustainable transport measures could be considered too. We propose:

HE9 1. c. "Take opportunities to reduce impacts of existing motor traffic, including parking, on conservation areas, and avoid increasing such impacts."